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Final
General Management Plan
Environmental Impact Statement

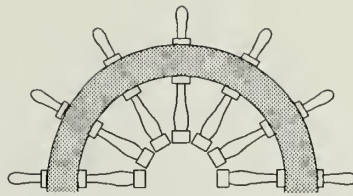
San Francisco Maritime

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Final General Management Plan / Environmental Impact Statement

July 1997

**SAN FRANCISCO MARITIME NATIONAL HISTORICAL PARK
San Francisco County, California**

The *Draft General Management Plan / Environmental Impact Statement* presented a proposed action and two alternatives for the management, use, and preservation of resources and developed areas within San Francisco Maritime National Historical Park. It also presented the purpose and significance of the park, draft vision and mission statements, interpretive themes, management objectives, and management zoning. The environmental consequences of the proposed action and the alternatives were evaluated as well. This *Final General Management Plan / Environmental Impact Statement* includes only factual corrections and text clarifications to the draft document plus copies of representative comment letters and responses of the National Park Service to public comments.

Alternative A (the proposed action) would provide a plan for emphasizing the preservation and maintenance of the park's collection, including the fleet of historic vessels, small watercraft, library, and archival materials. Minimal measures to slow down deterioration of the steam schooner *Wapama* would be implemented, but the vessel's underlying structural decay would not be addressed. The ship would be dismantled when it could no longer be maintained in a safe condition. However, before this action would be taken, efforts would be made to seek out other agency or private organizations interested in reconstructing or preserving *Wapama* as a dryberth exhibit. The park would also pursue multiple strategies for major ship restoration. Greater use of the park's collection by the public for research and interpretive purposes would be provided through the use of additional facilities, including rehabilitation of the Haslett Warehouse. The intersection at Hyde and Jefferson Streets would be redesigned to enhance pedestrian access and visibility of the pier and historic ships and to expand interpretive opportunities. Aquatic Park would be enhanced and maintained as a public open space, and recreational activities in the lagoon such as swimming, rowing, and the temporary mooring of sailboats would continue to be provided to all users. Park volunteer programs would be enhanced and visitors would be encouraged to experience other related sites in the Bay Area. The other alternatives include alternative B, which is similar to alternative A, with a few modifications, and alternative C, which is the no-action, minimum requirements alternative.


The *Draft General Management Plan / Environmental Impact Statement* for San Francisco Maritime National Historical Park was released for formal public review on August 2, 1996, as announced in the *Federal Register*. The draft document was on public review for 60 days.

A record of decision on the final plan will be issued 30 days after this final document has been made available for public review, as announced in the *Federal Register*. For further information about this plan, please contact San Francisco Maritime NHP at the following address:

Superintendent, San Francisco Maritime National Historical Park
National Park Service
Building E, Fort Mason
San Francisco, California 94123
Telephone: (415) 556-1659

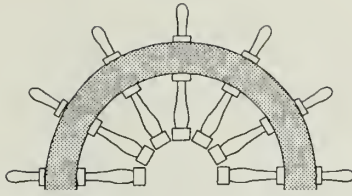
United States Department of the Interior • National Park Service

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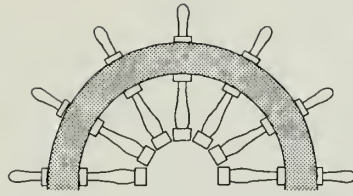
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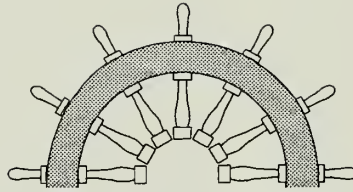


INTRODUCTION

This document is an abbreviated final environmental impact statement (FEIS), and the material included here is to be integrated with the *Draft General Management Plan/Environmental Impact Statement* (NPS D-7/June 1996). The abbreviated format has been used because changes to the draft are minor, do not result in modification of the proposal or alternatives, and do not result in new information that may have a significant effect on the environment. Use of this format is in compliance with the 1969 National Environmental Policy Act regulations (40 CFR 1503.4(c)). It is important that the reader use the *Draft Environmental Impact Statement* in reviewing this document because the two documents together describe the final proposed action, its alternatives, all significant environmental impacts, and the public comments that have been evaluated.

The first part of this document contains corrections of errors that were noted in the draft text. It also contains clarifying text changes in response to public comments. The second part contains responses to public comments and is broken down into responses to governmental agencies, organizations, and individuals. Because many of the letters from organizations and individuals presented the same issue, representative letters were chosen for response and are reprinted in this final document.

The major issues of concern raised in the letters were related to the preservation/ restoration of the steam schooner *Wapama*, and concerns related to shared use of the Sea Scout Base.



ERRATA

Corrections and revisions to the *Draft General Management Plan/ Environmental Impact Statement* (DEIS) are listed in this section. Revisions were made in response to comments from public and agency reviews of the DEIS. These revisions have not resulted in substantive modification of the proposed action or the alternatives. It has been determined that the revisions do not require additional environmental analysis within this document.

Changes to existing sentences are in bold:

SUMMARY

page v second column, second paragraph, fourth sentence, change to read: Visitors would be guided by visual, physical, and interpretive connections between the park's primary facilities (Hyde Street Pier, Haslett Warehouse, Aquatic Park, **Victorian Park**, and building E).

PURPOSE AND NEED FOR THE PLAN

INTRODUCTION

page 3 second column, second paragraph, second sentence, change to read: The exhibit facility is the Aquatic Park Bathhouse building, **a national historic landmark**, completed in 1939 as the centerpiece of the development.

page 3 second column, third paragraph, second sentence, change to read: the **historic** Hyde Street cable car

MANAGEMENT OBJECTIVES

page 16 first column, first bullet statement, change to read: (historic vessels, small watercraft, artifacts, art, historic documents, library materials, **historic structures**, and the historic district)

MANAGEMENT ZONING

page 18 first column, first paragraph, first sentence, delete: **and a portion of Victorian Park**.

page 19 Management Zones map. The Development Zone boundary has been revised to include all of Victorian Park, which is not a contributing feature of the historic Aquatic Park development. Victorian Park was constructed during the 1960s, which is outside the period of historic significance.

LEGEND

- San Francisco Maritime National Historical Park Boundary
- Cultural Management Zone
- Development Management Zone
- San Francisco Maritime National Historical Park Use

- Cultural Zone
- Aquatic Park Historic District
 - Aquatic Park Lagoon
 - Sea Scout Base

- Development Zone
- Hyde Street Pier
 - Victorian Park
 - Hyde/Jefferson Streets
 - Swimming/Rowing Clubs

- Cultural Zone
- Fleet of Historic Vessels

- Cultural Zone
- Haslett Warehouse
 - Historic Vessel

- Development Zone
- Bocce Ball Courts
 - Van Ness Avenue

MANAGEMENT ZONES

San Francisco Maritime National Historical Park
U. S. Department of the Interior
National Park Service
DSC/May '97/350/20,022A



CONTEXT FOR THE PLAN

ISSUES BEYOND THE SCOPE OF THIS PLAN

page 22 Delete second column, last paragraph

INFLUENCE OF OTHER PLANS AND PROJECTS ON THIS PLAN

page 24 first column, second paragraph, second sentence, change to read: The draft plan is a product of a **four-year public planning process conducted by the Port with assistance from a waterfront plan advisory board.**

page 24 first column, third bullet statement, change to read: provide a diversity of activities **for all San Franciscans and visitors to enjoy**

page 24 first column, fourth bullet statement, change to read: improve **public** access along the waterfront

page 24 first column, add after last bullet statement:
• **create economic opportunities that reflect the diversity of the San Francisco population**

page 24 second column, second paragraph, change to read: *Hyde Street Fishing Harbor and Pier 45 Fishing Industry Facilities.* In 1988 the Port Commission proposed improvements to Pier 45 and the construction of the Hyde Street Fishing Harbor to improve the facilities for the commercial fishing industry at Fisherman's Wharf. The project included renovation of fish handling and processing facilities at Pier 45 and a new 88-berth fishing harbor along the east side of the Park Service's Hyde Street Pier. Following the 1989 Loma Prieta earthquake, the Port refocused its efforts to upgrade the fishing industry facilities on Pier 45. The \$11.6 million project is completed and the fishing industry space on the west side of the pier is over 90% leased. Tenants include some of the major Northern California fish processors and handlers. The Port is working with a community advisory group to plan the new uses for the east side of Pier 45. The preferred alternative includes fishing industry space as well as space for an educational attraction or event space. The Port completed a *Draft Environmental Impact Report* for the Hyde Street Fishing Harbor and Sheds A & C in April 1996. The project currently consists of a 60-berth harbor, support facilities such as restrooms, a work dock, and parking. Funding has been identified and the Port intends to begin final design and construction in 1997 following environmental and regulatory approval. The Port has coordinated the design of the harbor berths with the Park Service to ensure that adequate access is provided for historic vessel maintenance activities and the periodic removal of the park vessels to dry dock facilities. This will be incorporated in the final environmental impact report.

ALTERNATIVES, INCLUDING THE PROPOSED ACTION

ACTIONS COMMON TO ALL ALTERNATIVES

HISTORIC VESSEL PRESERVATION PLAN

page 33 first column, third paragraph, second sentence, change to read: The U. S. Forest Service

SPECIFIC PARK MANAGEMENT PLANS

page 37 second column, insert after the last paragraph:

Hazardous Materials Plan

The park would prepare a hazardous materials plan to address the proper handling and storage of all hazardous materials used in the park. The park would make efforts to avoid hazardous material incidents and to control or minimize them should they occur. Prevention would include acquisition of minimum quantities of hazardous materials; selection of the least toxic materials; implementation of safe use, storage, and disposal practices; recycling of spent materials; and the development of response programs. Activities pertaining to hazardous materials, including purchase, storage, transportation, and disposal, would comply with federal, state, and local laws and regulations. The park would coordinate with city of San Francisco and the Port of San Francisco in an effort to have the park's plan consistent with the *San Francisco Oil Spill Prevention and Response Plan*.

SUSTAINABLE DEVELOPMENT

page 39 first column, fourth paragraph, fourth sentence, change to read: Options for future vessel preservation projects should include the evaluation of timber acquisition from a number of existing sources, including existing lumber mills, approved U.S. Forest Service harvesting programs, **salvaged old-growth wood from demolition projects**, and though not preferred, the use of pre-engineered lumber products.

ALTERNATIVE A (PROPOSED ACTION)

OVERVIEW

page 40 first column, first paragraph, first sentence, change to read: Alternative A (the proposed action) would emphasize the preservation and maintenance of the park's resources, such as the fleet of historic ships, small watercraft, **museum collection, historic structures**, and library and archival materials.

CULTURAL RESOURCE MANAGEMENT

Historic Ships Treatment

- page 43 first column, add after fourth paragraph: **Dismantling would be undertaken only as a last resort before implementation, The Park Service, in full consultation with the state historic preservation officer, would explore the widest possible range of alternative measures for preserving the vessel. Such alternatives would include, in priority order, leasing of the vessel, working with local/state/federal government or private agencies to relocate the vessel to a site conducive to preservation and interpretation, or transfer to a federal or state or private entity with the proven capability of funding and carrying out the preservation of the vessel.**
- page 43 first column, fifth paragraph, first and second sentence: delete and add: **If leasing, relocation, or transfer of the vessel was impossible within two years from the date of completion of the general management plan, or if structural collapse was imminent and the vessel became a safety hazard, the Park Service would demolish the vessel. The Park Service would provide the state historic preservation officer the opportunity to comment on the decision to demolish the vessel. If the officer would disagree with such action, the Park Service would consult according to the programmatic agreement, stipulation IX, dispute resolution.**

Collection Facilities

- page 44 first column, second paragraph, change to read: **The park would work cooperatively with Golden Gate National Recreation Area to pursue development of a single collection management facility in a building at the Presidio that meets the needs of both parks.** Storage for the park's artifact and small watercraft collection and work space for the collections management department would be consolidated in this facility. The building would be improved as necessary to meet seismic safety requirements and provide adequate environmental controls and equipment for those functions. **Until a facility is developed, existing offsite space** would be maintained at one or more offsite locations (such as San Bruno warehouse and East Fort Baker building 670). Storage facilities for nitrate cellulose negatives from San Francisco Maritime National Historical Park and Golden Gate National Recreation Area would be relocated to storage space at the Presidio or some other repository facility.

VISITOR USE AND DEVELOPMENT

Access and Circulation

- page 46 first column, second paragraph, add after last sentence: **The 1980 *General Management Plan* for Golden Gate National Recreation Area includes a proposal to work with the city to develop a multilevel parking garage at the foot of Van Ness Avenue to help offset the waterfront parking deficit. The park would cooperate in this effort to improve parking capacities in this area of the waterfront.**
- page 46 first column, third paragraph, add after last sentence: **To improve access, the park would support related transportation proposals in the Golden Gate *General Management Plan* and Presidio *General Management Plan Amendment*. These include opening the railroad tunnel under Fort Mason as an access to the maritime park from**

the Marina District and Presidio and extending the F-line rail system from Fisherman's Wharf west through Aquatic Park to the Presidio; and establishment of a system of water shuttles accessing park sites in San Francisco Bay.

- page 47 second column, second paragraph, fourth sentence, change to read: The swimming and rowing clubs would remain adjacent to the forepier, **consistent with the Golden Gate National Recreation Area *General Management Plan Amendment***

Parkwide Interpretation and Education

- page 46 second column, fifth paragraph, add after third sentence: **The park would also support the growth and development of community outreach efforts for educational programs, such as the successful Age of Sail Living History Program.**
- page 47 first column, add at end of second paragraph: **The park would also explore opportunities to work with tour operators to enhance and broaden visitation opportunities to the park.**

Hyde Street Pier Development Concept Plan

- page 47 first column, fourth paragraph, change last sentence to read: **In cooperation with the San Francisco Sea Scouts, the park would also explore options to provide sail training at the Sea Scout Base. Appropriate agreements would be established with the Sea Scouts for operation and use of the facility.**
- page 47 second column, second paragraph, fourth sentence, change to read: The swimming and rowing clubs would remain adjacent to the forepier, **consistent with the Golden Gate National Recreation Area *General Management Plan Amendment*.**

Haslett Warehouse Development Concept Plan

- page 51 first column, second paragraph, first sentence, change to read: **It is the short-term goal of the National Park Service to provide for the rehabilitation, preservation, and maintenance of the Haslett Warehouse. The long-term goal would be to relocate the maritime museum to the warehouse and use it as the primary museum exhibit facility as well as the park's headquarters/administration and visitor contact.**

Aquatic Park/Victorian Park Development Concept Plan

- page 56 second column, second paragraph, first sentence, change to read: The Aquatic Park Bathhouse (current maritime museum), **a national historic landmark**, would continue to be used as the park's primary exhibit facility until space is obtained in the Haslett Warehouse for relocation of the museum.
- page 59 first column, fourth paragraph, second and third sentences, change to read: **In cooperation with the San Francisco Sea Scouts, the park would explore options to provide sail training at the Sea Scout base. An appropriate agreement would be established with the Sea Scouts for operation and use of the facility.**
- page 59 add at end of first column: **Although the municipal pier is under the jurisdiction of Golden Gate National Recreation Area, the pier is an important visual and physical element of the park. It provides critical breakwater protection to the historic ships; visually defines the northwest limits of the park; provides visitors with views of the**

ships and waterfront; and is an integral part of the Aquatic Park National Historic District. San Francisco Maritime National Historical Park would work cooperatively with Golden Gate National Recreation Area to ensure its preservation.

PARK OPERATIONS

page 59 second column, first paragraph, add at end of paragraph: **The park would also pursue opportunities to establish additional partnerships or other cooperative efforts with both the public and private sector to supplement NPS staff and funding where necessary and appropriate.**

BOUNDARY ADJUSTMENTS/PROPERTY ACQUISITION

page 60 first column, first paragraph, add after first sentence: **Acquisition of the pier would also require state legislative action. The Park Service would continue to maintain the pier.**

ALTERNATIVE B

CULTURAL RESOURCE MANAGEMENT

Historic Ships Treatment

page 62 second column, first paragraph, add after third sentence: **The SS *Jeremiah O'Brien* would be berthed at an appropriate site in San Francisco Bay to provide for visibility and public access, such as Pier 32 or adjacent to Pier 3 in lower Fort Mason.**

Hyde Street Development Concept

page 64 first column, first paragraph, add after fifth sentence: **A lease agreement would be established by the Park Service with the clubs for use of the new location within the park.**

BOUNDARY ADJUSTMENTS/PROPERTY ACQUISITION

page 74 first column, second paragraph, add after first sentence: **Acquisition of the pier would also require state legislative action. The Park Service would continue to maintain the pier. In addition, upon relocation of the swimming and rowing clubs to the west wide of the Aquatic Park lagoon, an appropriate long-term lease agreement would be established by the National Park Service.**

ALTERNATIVE C: NO ACTION/MINIMUM REQUIREMENTS

BOUNDARY ADJUSTMENTS/PROPERTY ACQUISITION

page 83 first column, second paragraph, add after second sentence: **Acquisition of the pier would also require state legislative action. The Park Service would continue to maintain the pier. In addition, upon relocation of the swimming and rowing clubs to the**

west wide of the Aquatic Park lagoon, an appropriate long-term lease agreement would be established by the National Park Service.

TABLE 8: SUMMARY OF ALTERNATIVES

page 88

second column, eighth paragraph, delete: **building 201 – Fort Mason**

AFFECTED ENVIRONMENT

NATURAL RESOURCES

CLIMATE AND AIR QUALITY

page 121

first column, second paragraph, fourth sentence, change to read: **As of November 1, 1996, the county of San Francisco has been designated a federal nonattainment area for carbon monoxide and a maintenance area for ozone. The county is a state nonattainment area for ozone and particulate matter.**

SOCIOECONOMIC ENVIRONMENT

SURROUNDING LAND USE

page 129

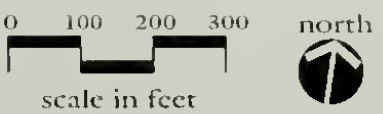
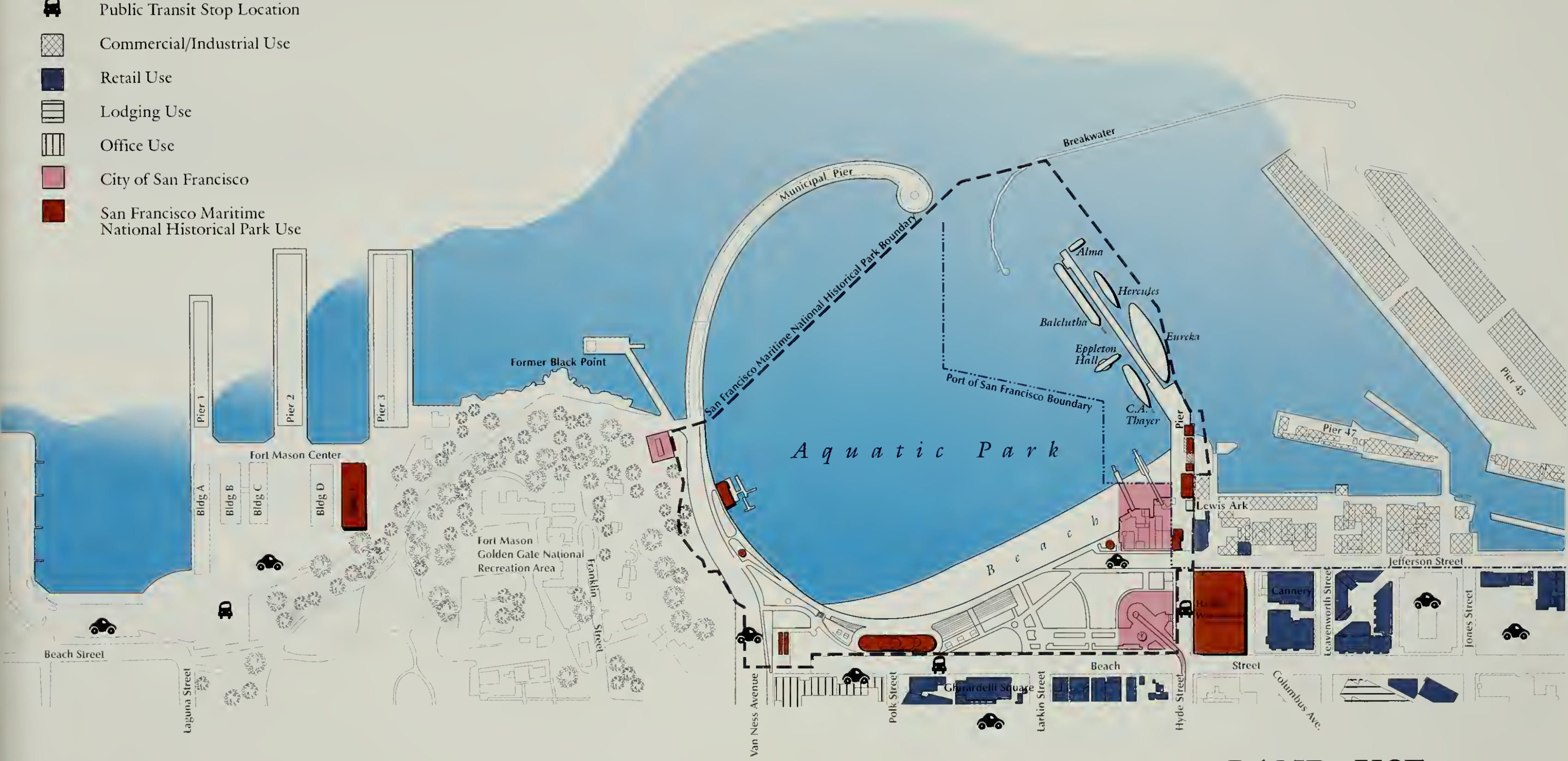
second column, second paragraph, change to read: **In 1988 the Port Commission proposed improvements to Pier 45 and the construction of the Hyde Street Fishing Harbor to improve the facilities for the commercial fishing industry at Fisherman's Wharf. The project included renovation of fish handling and processing facilities at Pier 45 and a new 88-berth fishing harbor along the east side of the Park Service's Hyde Street Pier. Following the 1989 Loma Prieta earthquake, the Port refocused its efforts to upgrade the fishing industry facilities on Pier 45. The \$11.6 million project is completed and the fishing industry space on the west side of the Pier is over 90% leased. Tenants include some of the major Northern California fish processors and handlers. The Port is working with a community advisory group to plan the new uses for the east side of Pier 45. The preferred alternative includes fishing industry space as well as space for an educational attraction or event space. The Port completed a *Draft Environmental Impact Report* for the Hyde Street Fishing Harbor and Sheds A & C in April 1996. The project currently consists of a 60-berth harbor, support facilities such as restrooms, a work dock, and parking. Funding has been identified and the Port intends to begin final design and construction in 1997 following environmental and regulatory approval. The Port has coordinated the design of the harbor berths with the Park Service to ensure that adequate access is provided for historic vessel maintenance activities and the periodic removal of the park vessels to dry dock facilities. This will be incorporated in the final environmental impact report.**

page 133

Land Use map. The Port of San Francisco boundary line has been revised to end just west of the Hyde Street Harbor breakwater.

LEGEND

- San Francisco Maritime National Historical Park Boundary
- Public Parking Location
- Public Transit Stop Location
- Commercial/Industrial Use
- Retail Use
- Lodging Use
- Office Use
- City of San Francisco
- San Francisco Maritime National Historical Park Use



LAND USE

San Francisco Maritime
National Historical Park
U. S. Department of the Interior
National Park Service
DSC/May '97/350/20,021A



ENVIRONMENTAL CONSEQUENCES

IMPACTS OF ALTERNATIVE A (PROPOSED ACTION)

IMPACTS ON AQUATIC LAGOON/SHORELINE ENVIRONMENT

Analysis

Page 146 first column, add after fourth paragraph: **Total area impacted by all proposed construction activity is expected to be less than 1 acre. Further environmental analysis and NEPA documentation would be prepared for individual construction projects during the project design stage. More detailed information would be developed at that time. Appropriate mitigation for such erosion-control measures would also be identified during project design.**

IMPACTS ON TRAFFIC AND PARKING

Analysis

page 148 second column, fourth paragraph, add after second sentence: **The Port of San Francisco would lose revenue from the 13 metered parking spaces it owns that generate about \$40 per meter per week.**

Conclusion

page 149 second column, add after first paragraph: **Changes in traffic and parking patterns could negatively affect local businesses, clubs, and Hyde Street Harbor. A traffic and transportation analysis would be completed before implementation of any vehicular access/circulation or parking proposals. Additional environmental analysis, including potential socioeconomic impacts and NEPA documentation, would be completed.**

Cumulative Impacts

page 149 second column, third paragraph, change to read: **Further potential increases in traffic and parking demand would be generated by the Hyde Street Harbor project proposed by the Port Commission, however, the Hyde Street Harbor *Draft Environmental Impact Report* prepared by the Port of San Francisco found no significant impacts from traffic.**

IMPACTS OF ALTERNATIVE B

IMPACTS ON AQUATIC LAGOON/SHORELINE ENVIRONMENT

Analysis

Page 155 second column, add after fourth paragraph: **Total area impacted by all proposed construction activity would be less than 1 acre. Further environmental analysis and NEPA documentation would be prepared for individual construction projects during the project design stage. More detailed information would be developed at that time. Appropriate mitigation such erosion control measures would also be identified during project design.**

IMPACTS ON TRAFFIC AND PARKING

Analysis

page 157 second column, fifth paragraph, add after second sentence: **The Port of San Francisco would lose revenue from the 13 metered parking spaces it owns that generate about \$40 per meter per week.**

Conclusion

page 158 first column, add after third paragraph: **Changes in traffic and parking patterns could negatively affect local businesses, clubs, and Hyde Street Harbor. A traffic and transportation analysis would be completed before implementation of any vehicular access/circulation or parking proposals. Additional environmental analysis, including potential socioeconomic impact and NEPA documentation, would be completed.**

Analysis

page 158 first column, first paragraph, second sentence, change to read: **Further potential increases in traffic and parking demand would be generated by the Hyde Street Harbor project proposed by the Port Commission, however, the Hyde Street Harbor *Draft Environmental Impact Report* prepared by the Port of San Francisco found no significant impacts from traffic.**

CONSULTATION AND COORDINATION, APPENDIXES, BIBLIOGRAPHY, INDEX

CONSULTATION AND COORDINATION

LIST OF AGENCIES, ORGANIZATIONS, AND INDIVIDUALS TO WHOM THE DRAFT ENVIRONMENTAL IMPACT STATEMENT IS BEING SENT

Organizations and Businesses

page 170 second column, Organizations and Businesses, change to read:
American Association of Museums

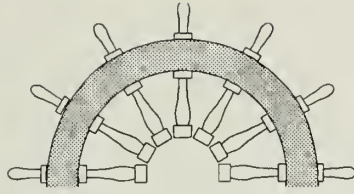
Libraries

page 171 second column, Libraries, change to read: Smithsonian **Institution** Library



The
Scow
Schooner
Alma

Comments and Responses Appendixes



COMMENTS AND RESPONSES

This section includes a summary of comments received through letters and public meetings following the release of the draft plan on July 25, 1996. A notice of availability was published in the *Federal Register* (FR) on August 2, 1996, which officially began the public review period. Approximately 316 copies of the draft were distributed to government agencies, public interest groups, and individuals. The public comment period covered 60 days and ended on October 3, 1996.

PUBLIC MEETINGS

Two public meetings were held in conjunction with the park's advisory commission at building F, Lower Fort Mason, San Francisco, California. The purpose of the meetings were to receive oral or written comments on the *Draft General Management Plan / Environmental Impact Statement*. Transcripts of the meetings were made. Nineteen people attended the August 21, 1996, meeting and 12 people attended the August 22, 1996, meeting. Comments received during the meetings were reiterated in the written comments and are addressed in the following section.

WRITTEN COMMENTS

A total of 57 comment letters were received from government agencies, organizations, interest groups, and individuals during the comment period. All letters from governmental agencies are reprinted in this section. Also included are reprints of letters from individuals and interest groups that raised points needing clarification, resulted in text corrections, or that were chosen to represent the range of issues included in the individual letters. No responses are provided to comments that only expressed opinions and did not identify a needed text clarification or correction.

The majority of the written comments focused on two issues presented in the *Draft General Management Plan / Environmental Impact Statement* — the preservation/restoration of the steam schooner *Wapama* (20 letters), and concerns related to shared use of the Sea Scout base (12 letters). Some of these letters also expressed preference for alternative A, the proposed action (7 letters), alternative B (3 letters), and alternative C (11 letters), which proposed maintaining the current existing conditions. Other letters received from organizations and interest groups focused on specific actions in the alternatives and did not endorse any alternative preference.

Letters received from local governmental agencies, such as the Port of San Francisco and the Planning Department and Recreation and Park Department, City and County of San Francisco, provided specific comments related to jurisdictional oversight, agency reviews and approvals, consistency of land uses, and providing for additional project analysis before actual implementation.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

September 27, 1996

Stanley T. Albright
Regional Director
Western Regional Office
National Park Service
600 Harrison St., Suite 600
San Francisco, CA 94107-1375

Dear Mr. Albright:

The Environmental Protection Agency (EPA) has reviewed the Draft General Management Plan & Environmental Impact Statement (DEIS) for the San Francisco Maritime National Historical Park, San Francisco County, California. We are submitting the following comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA). Council on Environmental Quality regulations implementing NEPA (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

In proposing the management plan, the National Park Service (NPS) examined three alternatives, including a "no action". The alternatives address management policies for natural, historic, and cultural resources, and plans for visitor use facilities, and interpretive sites. Alternatives A and B would entail upgrades of the Victorian Park setting, Hyde Street Pier, and movement of exhibits and facilities from the Aquatic Park Bathhouse to the Haslett warehouse, construction of additional interpretive sites and visitor structures. The preferred alternative describes a program of preservation and enhancement of the historic and cultural resources in order to expand visitor uses.

We are concerned with several aspects of the DEIS. Namely that there is not a complete discussion in the DEIS regarding the impacts to water quality from construction activities and potential stormwater runoff from the facilities in the park in keeping with the requirements of the National Pollution Discharge Elimination System, or cumulative impacts to localized air quality in keeping with the Clean Air Act. The DEIS does not discuss the disposition, maintenance, and storage of materials (solvents, petroleum products, paints) used in the restoration of the historic ships and also if there would be herbicide and pesticide treatments on the ships, piers, and in Aquatic park. While the impacts associated with these issues may prove to be substantively insignificant, they should nevertheless be addressed and evaluated in the document.

200 24

U.S. DEPARTMENT OF AGRICULTURE

WATER RESOURCES DIVISION

4

COMMENTS

RESPONSES

We believe that more detailed information should be included in the Final EIS such as guidelines and procedures regarding construction activities; runoff; erosion control; air quality; hazardous materials; pathway and landscape management; land use inside and outside the Monument; cumulative impacts; and the related specific mitigation measures. Our review comments, which are attached, discuss these concerns in greater detail.

Based on our review and the aforementioned issues we have assigned a rating of EC-2 (Environmental Concerns --Insufficient Information; see attached rating sheet) to the DEIS.

We appreciate the opportunity to review your DEIS. Please send two copies of the Final EIS to this office when the document is officially submitted to EPA Headquarters. If you have any questions, please call me at 415-744-1584, or contact David J. Carlson at 415-744-1577.

Yours truly,



for David Ferrel, Chief
Office of Federal Activities

Attachments (2)

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(002)

VAN/012-010

DEPT. OF THE INTERIOR

DATE: 10/1/84

BA CONSULTING
NATIONAL PARK SERVICE/JAN FRANCISCO MARITIME NATIONAL HISTORIC PARK
DRAFT GENERAL MANAGEMENT PLAN/DESIGN/REHABILITATION PLAN

General Comments

The DEIS does not mention whether or not specific design and management issues which are not covered in this document will be addressed in future detailed plans and studies. A programmatic-level EIS, such as a General Management Plan, should provide a framework for more detailed plans and studies including mitigation measures to minimize the impacts from the Discussions implementation of the various parts of the project. The DEIS should cover future plans and NEPA documentation in the FEIS should cover the Haslett warehouse, the final disposition of the Wapama, and the final design of the Sea Scout base.

We suggest that the FEIS discuss any foreseeable changes (in existing site design and location plane) that could either affect the priorities identified in the DEIS or introduce significant new resource management issues. The FEIS should explain how the NPS would monitor impacts from these projects to ensure consistent management techniques are applied throughout the Historic Park.

Also, the DEIS is very vague in its discussion of the different development portions of the proposed alternatives, such as the removal and then construction of the Maritime bookstore, other potential uses for the Aquatic Park bathhouse, landscaping and re-landscaping certain areas, and development of the plaza area at Hyde and Jefferson streets and near the cable car turnaround. The FEIS would benefit from greater detail regarding the specific actions planned for these facilities, (restoration and/or construction), and the intended direction and uses for these areas.

Carrying capacity

The DEIS discusses the Historic Park's carrying capacity but does not provide a context for the numbers of visitors in relation to what the park's resources can support. The impression in the DEIS is that the park is underutilized and that the alternatives address methods and designs to encourage greater visitation. Also, there appears to be a shift in the visitation patterns away from the pier to the museum but the DEIS does not clearly discuss what may have caused the shift other than to say the entrance to the pier is less inviting. The FEIS should discuss what the ultimate goal of the NPS is, as far as visitation is concerned with the implementation of either alternative A or B. The FEIS should also discuss how the increase in people visiting the park and using the resources impact those cultural and natural resources.

1. Future detailed design and allocation of space in the Haslett Warehouse would depend on the actual terms of the partnership agreement to lease the building, which would be worked out between the park and a private developer. No future NEPA documentation is anticipated for the adaptive reuse of the Haslett Warehouse. As noted in the document, during the design stage a determination of onsite parking within the warehouse would be determined. This information would be incorporated into a future traffic and parking analysis and environmental documentation. (See Planning Department, City and County of San Francisco, response 6). No future NEPA documentation is anticipated for the disposition of the *Wapama*. The draft plan calls for an assessment of the Sea Scout base's condition and a structural evaluation to determine the facility's rehabilitation needs. When these needs and subsequent rehabilitation plan/design are determined, site-specific impacts would be evaluated. The document has been revised to include the need for further environmental analysis and NEPA documentation during the project design stage.
2. Some of the proposed actions in the document are changes from existing conditions. The priorities that respond to management issues are reflected in the proposed actions.
3. The document adequately distinguishes what facilities would be constructed, reconstructed, or rehabilitated and the uses proposed for each one. Please refer to the development concept plans contained in the document.
4. The discussion on carrying capacity in the document states that the visitor use goals are to ensure an enjoyable and educational experience as well as to protect the historic fabric and other structural elements of the historic ships. Capacity limits are identified for the resources within the park. As future conditions warrant, park management could establish additional capacity limits on visitation to protect resources.

COMMENTS

RESPONSES

5. The document has been revised to clarify that mitigating measures would be developed during the project design stage for all construction projects. Use of appropriate guidelines would be determined at that time.
6. The document has been revised to note that during the project design stage, when more detailed information is developed, appropriate erosion control measures would be identified for individual construction projects. Cumulative construction impacts would not exceed 5 acres.

ON COMBUSTION
NATIONAL FIRE SERVICE/AMERICAN MARITIME MUSEUM HISTORIC PARK
DRIFT GENERAL MANAGEMENT PLAN/REPT. 1998

Water Resources

In January 1993, EPA and the National Oceanic and Atmospheric Administration jointly announced the availability of the Guidelines for Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters (Guidance) pursuant to Section 6217(g) of the Coastal Zone Reauthorization Amendments of 1990. We recommend that the NPS consider this Guidance for the construction and development projects in the Historic Park and management of those areas. These guidelines should be referenced in the FEIS discussion of mitigating the construction impacts, as well as the discussion of implementing the guidelines along the roadway, parking areas, re-landscaped areas, and associated facilities when construction is completed.

Section 6217(g)(5) defines management measures as, "economically achievable measures for the control of the addition of pollutants from existing and new categories and classes of nonpoint sources of pollution, which reflect the greatest degree of pollutant reduction achievable through the application of best available nonpoint pollution control practices, technologies, processes, siting criteria, operating methods, or other alternatives."

National Pollution Discharge Elimination System (NPDES)

The DRIS does not contain a discussion of the impacts related to the removal of the maritime bookstore from the Hyde Street Pier and the creation of a new bookstore building in Victorian Park and the changes to the plaza area northwest of the cable car turnaround and repaving of the forepier area (Hyde and Jefferson Streets). We are concerned that serious erosion of the impacts may occur due to the construction and maintenance of the road/stair/trail and new plaza system proposed for the area. We are concerned the NPS does not offer an erosion control plan to be implemented within the site. The document does not indicate the expected extent of erosion impacts due to development and land disturbance at the Historic Park. Since we could not ascertain the extent of surface land disturbance, we are concerned that the activities described in the DRIS could trigger the NPDES permitting requirements.

According to the requirements in 40 CFR section 122.26 (b)(14)(x), if the cumulative amount of disturbed land from the proposed actions within any of the alternatives will be greater than five acres, then all of the actions would be subject to the General NPDES permit for Discharge of Storm Water runoff associated with construction activities, California permit

IN COMMENTS
NATIONAL PARK SERVICE SAN FRANCISCO MARINE NATIONAL HISTORIC PARK
CHARTERED, DEVELOPMENT PLANNING DEPARTMENT, 1988

#CAS000002. If the NPS determines a permit will be necessary, the NPS should contact the State Water Resources Control Board (SWRCB) at 901 "P" Street, P.O. Box 100, Sacramento, CA, to obtain a copy of the permit and the Notice of Intent (NOI). The NPS must complete and file the NOI and must develop and implement a storm water pollution prevention plan containing Best Management Practices prior to commencing any construction.

If the proposed actions would impact less than five acres the local Regional Water Quality Control Board may still require that the actions be subject to the General NPDES permit. In this situation, we recommend that the NPS consult with the local Regional Water Quality Control Board.

We recommend that the NPS place a preliminary erosion control plan in the final EIS as the reference for future environmental documents. We are including, as attachment A, an outline of erosion control management practices for guidance on methods that can be used to minimize erosion from road and building construction projects. Also, the NPS should identify, in the FEIS, the amount of land that would be disturbed by the development activities proposed in all of the alternatives and discuss the applicability of 40 CFR 122.26 (b)(14)(x) and the California General Permit # CAS000002. The FEIS should also describe the process the NPS intends to use to adhere to the NPDES permitting requirements, if they are applicable.

Coastal Zone Management Act

The Coastal Zone Management Act (CZMA) requires that Federal Agencies be consistent with the policies of state coastal zone management programs when conducting activities which affect a coastal zone. The Federal Agency must review the state Coastal Zone Management Plan (CZMP) to determine whether the activity would be consistent with the Plan and then notify the State of its determination. Federal agencies must prepare a written consistency determination which includes: a detailed description of the action, its associative facilities, and coastal zone effects; a brief statement on how the activity would be consistent with the state CZMP; and, data to support the consistency determination. The FEIS should indicate whether the NPS has been in consultation with the BCDP regarding the consistency of the alternatives with the Coastal Zone Management Plan.

7. The draft document was submitted to the San Francisco Bay Conservation and Development Commission requesting their concurrence with the Park Service's determination that the proposed action would be consistent with the Coastal Management Program for San Francisco Bay. Please see the letter from San Francisco Bay Conservation and Development Commission for their concurrence (appendix D).

ENVIRONMENTAL
NATIONAL PARK SERVICE SAN FRANCISCO MARITIME NATIONAL HISTORIC PARK
DRAFT GENERAL MANAGEMENT PLAN/ISSUE IDENTIFICATION, 1988

Hazardous Materials

The DEIS does not contain a discussion of the use, disposition, storage, and removal of hazardous substances that are used for the restoration and maintenance of the historic ships and pier. Also, the DEIS does not discuss the use of herbicides and pesticides in and around the park either on the grounds or on the pier. The NPS should identify in the FEIS that the provisions of the Resource Conservation and Recovery Act (RCRA) and associated state hazardous waste disposal requirements have been considered and implemented as part of the Management Plan, and further disclose how the NPS propose to handle and treat any hazardous materials. We strongly recommend that the FEIS discuss the use, storage, and disposition of solvents, paints, petroleum products or any other materials that could be classified as a hazardous waste under Federal or California state regulations.

The NPS should discuss the measures in place to either eliminate or minimize impacts from a possible release of any of these materials into the environment, particularly a release that may impact bay water quality and aquatic life.

We recommend that the FEIS describe in detail the procedures that NPS will follow in order to meet the requirements. The FEIS should identify: 1) that the NPS or their contractor may become a hazardous waste generator; 2) that a generator identification number must be obtained in order to transport hazardous materials; and, 3) the procedures that would be used to comply with the land ban requirements for handling and disposing of hazardous waste. The FEIS should also disclose whether the NPS has met all OSHA regulations regarding health and safety and handling of hazardous waste.

Air Quality

Cumulative Impacts

The FEIS should address cumulative air quality impacts, including direct and indirect emissions associated with the project plus emissions associated with other future development, such as the Port of San Francisco's plans for the areas adjacent and in the vicinity of the Park. Future scenarios should be carefully specified using the most recent estimates of population, employment, travel, and congestion approved by the relevant Planning Agency.

8. The park is required by NPS policy to address hazardous materials storage and handling. The document has been revised to acknowledge the need for such a plan.

9. It is the conclusion of the draft document that no significant effects on air quality would occur. Based on worst-case modeling assumptions, emissions would be negligible. It is the responsibility of the State and Environmental Protection Agency to address overall growth issues and associated emissions impacts in the greater San Francisco area through the Clean Air Act State Implementation Plan process.

10. Implementation of proposed actions would have very minimal potential for adverse impacts or pollution generation. As discussed in the impact analysis, potential sources of water pollution from use and operation of park facilities would be avoided or mitigated. The document has been revised to note that erosion control measures for all proposed construction activities would be identified during project design. See response 6.

BY COMMENTER
NATIONAL PARK SERVICE HAS REVIEWED NATIONAL SYSTEM MANAGEMENT PLAN
ENVIRONMENTAL MANAGEMENT PLAN FOR SEPTEMBER, 1989

Pollution Prevention

Pursuant to Public Law 910-508, Pollution Prevention Act of 1990 (PPA), "it is the policy of the United States that pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible, and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner." The PPA should describe how the NPS would implement programs and practices to insure that the project would comply with the PPA.

ENVIRONMENTAL PROTECTION AGENCY
WATER POLLUTION CONTROL DIVISION
OFFICE OF WATER QUALITY MANAGEMENT
WASHINGTON, D.C. 20460

Attachment A

Erosion

1. Schedule projects so clearing and grading is done during times of minimum erosion potential.
 2. Mark and clear off only areas essential for construction.
 3. Avoid disturbing vegetation on steep slopes or other critical areas such as highly erodible soils and areas that drain directly into sensitive water bodies.
 4. Route construction to avoid existing and newly planted vegetation.
 5. Protect natural vegetation with fencing, tree armoring.
 6. Cover or stabilize topsoil stockpiles.
 7. Use wind erosion controls to act as wind barriers such as solid board fences, snow fences and bales of hay.
 8. Seed and mulch disturbed areas.
- Siting Roadways and Bridges
1. Consider the type and location of permanent erosion and sediment controls such as vegetative buffer strips, grass swales, energy dissipators and velocity controls.
 2. Avoid marshes, bogs and other low-lying lands subject to flooding.
 3. Avoid locations requiring excessive cut and fill.
 4. Avoid locations subject to subsidence, land slides, rock outcroppings and highly erodible soils.
 5. Size right-of-ways to include space for siting runoff pollution control structures, as appropriate.
 6. Avoid locations requiring numerous river crossings.
 7. Direct pollutant loadings away from bridge decks by diverting runoff waters to land for treatment.



PLANNING DEPARTMENT

City and County of San Francisco 1660 Mission Street San Francisco, CA 94103-2414
 (415) 554-4378 PLANNING COMMISSION ADMINISTRATION CURRENT PLANNING/ZONING LONG RANGE PLANNING
 FAX: 584-4499 FAX: 584-4499 FAX: 584-4435

September 27, 1996

William G. Thomas, Superintendent
 San Francisco Maritime National Historical Park
 National Park Service
 Building E, Fort Mason
 San Francisco, CA 94123

Received SAFR

OCT 1996

Superintendent's Office

COMMENTS RE: SAN FRANCISCO MARITIME NATIONAL HISTORICAL PARK
 DRAFT: General Management Plan & Environmental Impact Statement

Dear Mr. Thomas:

I am responding to the above document as the environmental planner working in the Department of City Planning's Office of Environmental Review. I am assigned to conduct much of the Port's environmental review. The focus in these comments is on the Draft EIS; comments on the proposed plan, as well as the environmental document, will also come to you from the Port. The documents are informative regarding the problems inherent in the conservation of the Port's very specific historic resources. The graphics were also most impressive.

There are a number of issues that we believe need further analysis:

1. We do not believe that the passing reference to acquiring more property is adequate. Please cover in more detail which property, how much property, what is on it now, and what uses for it the Park would foresee.
2. We are currently developing the comments and responses for the Draft EIR on the Hyde Street Harbor Pier 45 Sheds A and C. The relationship between your proposed project, particularly the cumulative aspects, and the Port's proposal needs further analysis.
3. In the section "Natural Resources - Climate and Air Quality", please check your statements regarding nonattainment against the most recently published BAAQMD CEQA Guidelines, published April 1996. It is a different picture from that presented in your document.
4. In the section "Visitor Use and Development", it is puzzling that some estimate regarding visitors from the United States is not included. For example, it would be informative to include the numbers of school children who visit the Park. For neighborhood relations, it would be helpful to have some information regarding use of the facilities by "locals" - old or young.

1. The proposed action calls for acquisition of Hyde Street Pier, if possible. The existing and proposed uses of the pier are clearly documented in the plan. Please refer to the index for all references regarding the pier. No other acquisition of property is proposed under alternatives A or C. Alternative B calls for negotiating the possible acquisition of the Maskell building (now called "Tradewinds") on the pier. This is discussed under alternative B, Hyde Street Pier Development Concept Plan.
2. Cumulative impacts are discussed in the document. It is unclear from the comment as to what specific cumulative aspects need further analysis. Possible cumulative effects from increased traffic and parking demand generated from the Hyde Street Harbor project are noted, although the Port's *Draft Environmental Impact Report* determined no significant impacts from traffic. The *Draft General Management Plan* has been revised to note the need for further analysis and environmental documentation regarding traffic and parking proposals.
3. The document has been revised to reflect the 1996 guidelines.
4. The document adequately recognizes and proposes to continue the uses of the park by schoolchildren and local residents.

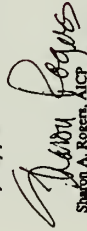
COMMENTS

Comments on SF Maritime National Historical Park
Death General Management Plan and
Environmental Impact Statement
September 27, 1996

5. In the "Socioeconomic Environment", it is not clear what the current parking need is, nor how it is met. I assume that it is anticipated that the proposed improvements would intensify the use of your facilities. How would the increased need for parking be met? How much of a contribution to existing or future congested conditions would occur?
6. Any proposals for vehicular access restrictions in this extremely popular and highly congested area requires a traffic and transportation analysis to explore the feasibility and impacts of such changes. For example, the implications of closing the Hyde and Jefferson Streets intersection to vehicular traffic is not adequately analyzed. This proposal would need to be explored, and a decision reached, with the Department of Parking and Traffic with approval by the San Francisco Board of Supervisors.
7. Hazardous materials, their use, cleanup, storage, and potential water quality implications needs further discussion.

Thank you for the opportunity to review your document.

Very truly yours,



Sharon A. Rogers, AICP
Associate Environmental Planner
Planning Department
City and County of San Francisco

cc: Sharon L. Polladin, Port of San Francisco
John Cooper, City Attorney

Chwp511dmspark.wpd

RESPONSES

5. It is anticipated that the proposed improvements would increase visitor use of the park. However, these visitors are expected to be drawn from the visitor base generated by the greater Fisherman's Wharf area. It is expected that a greater number of visitors to Fisherman's Wharf would also choose to visit the park because of its improved visibility. There would not necessarily be a greater demand for parking generated by the park itself. Additional commuter traffic could be generated. Parking in the Fisherman's Wharf vicinity is a concern. As noted in the impact section of the document, the park would pursue a number of actions to address parking concerns.

The document has also been revised to note the need for further analysis before implementation of any traffic and parking proposals. See response 6.
6. It is the goal of the proposed action to provide a more pedestrian-oriented focus at the Hyde Street and Jefferson Street intersection during heavy visitor use periods. However, a traffic and transportation analysis would be completed before implementation of any vehicular access/circulation or parking proposals. Additional environmental analysis and NEPA documentation would be completed as necessary, based on that further analysis. The document has been revised to note the need for further analysis.
7. The park is required by NPS policy to address hazardous materials storage and handling. The document has been revised to acknowledge the need for such a plan.

COMMENTS

City and County of San Francisco

Recreation and Park Department



September 24, 1996

VIA FAX 415-556-1624

Superintendent, San Francisco Maritime
National Historical Park
General Management Plan
National Park Service
Building E, Fort Mason
San Francisco, CA 94123

Received SAFR
OCT 3 1996
Superintendent's Office

Re: General Management Plan/ Environmental Impact Statement
San Francisco Maritime National Historical Park

Dear Superintendent:

The Recreation and Park Department wishes to comment on the draft General Management Plan/Environmental Impact Statement as it relates to Dolphin Club and the SouthEnd Rowing Club, lessees of our Department.

On July 30, 1987, the following resolution was adopted by the Golden Gate National Recreation Area (GGNRA) to revise the General Management Plan for Aquatic Park with respect to the two clubs:

"The swimming and rowing clubs at the foot of Hyde Street will remain in their present location under the continuing jurisdiction of the San Francisco Recreation and Parks Department. As long as their primary purposes is to facilitate swimming and rowing activities in the Bay and general scale and character of their structures remain essentially unchanged, the national Park Service has no desire to acquire them."

This Department restates the rationale which was the basis for the above amendment:

1. The Recreation and Park Department has no intention of transferring the subject property.
2. The character and integrity of the clubs as institutions representing a critical historical element of Aquatic Park would be adversely affected by federal acquisition.
3. Club members want to remain in existing facilities at their present location.
4. The General Management Plan rationale for moving the structures is not commensurate with the costs that would be incurred.

McLaren Lodge, Golden Gate Park
Fall and Stanyan Streets
FAX: (415) 666-3330
Information: (415) 666-7200
TDD: (415) 666-7043

San Francisco 94117

RESPONSES

1. Relocation of the clubs under alternative B was evaluated as a comparison to the proposed action (alternative A), which proposed maintaining the club buildings in their current location at the foot of Hyde Street. Alternative B proposed relocating the clubs to their original historic location at the foot of Van Ness Avenue to evaluate opening views to the Bay and to provide enhanced public access in this portion of the park. It was evaluated as having a positive visual effect because it would provide unobstructed views of the historic ships and Bay from the primary visitor access and use areas. Alternative A (Proposed Action) maintains the clubs' current location at the foot of Hyde Street as provided for in the Golden Gate National Recreation Area *General Management Plan Amendment*.

COMMENTS

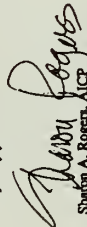
RESPONSES

Comments on SF Maritime National Historical Park
Draft General Management Plan and
Environmental Impact Statement
September 27, 1996

5. In the "Socioeconomic Environment", it is not clear what the current parking need is, nor how it is met. I assume that it is anticipated that the proposed improvements would intensify the use of your facilities. How would the increased need for parking be met? How much of a contribution to existing or future congested conditions would occur?
6. Any proposals for vehicular access restrictions in this extremely popular and highly congested area require a traffic and transportation analysis to explore the feasibility and impacts of such changes. For example, the implications of closing the Hyde and Jefferson Streets intersection to vehicular traffic is not adequately analyzed. This proposal would need to be explored, and a decision reached, with the Department of Parking and Traffic with approval by the San Francisco Board of Supervisors.
7. Hazardous materials, their use, cleanup, storage, and potential water quality implications needs further discussion.

Thank you for the opportunity to review your document.

Very truly yours,


Sharon A. Rogers, AICP
Associate Environmental Planner
Planning Department
City and County of San Francisco

cc: Sharon L. Polledri, Port of San Francisco
John Cooper, City Attorney

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PORT OF SAN FRANCISCO

September 27, 1996

Mr. William G. Thomas
Superintendent
San Francisco Maritime National Historic Park
National Park Service
Building E, Lower Fort Mason, Room 265
San Francisco, CA 94123

Dear Mr. Thomas,

Re: Draft General Management Plan
San Francisco Maritime National Historical Park

The Port of San Francisco is pleased at the publication of the long-awaited Draft General Management Plan for the San Francisco Maritime National Historic Park. Of the alternatives proposed in the General Management Plan, the Preferred Alternative "A" holds the most promise from the Port's perspective. We believe it provides the most realistic planning and development framework for the Park's facilities and will assist our mutual efforts to ensure the compatibility of cultural, recreational and visitor oriented uses with the commercial fishing industry, including the Port's new Hyde Street Fishing Harbor, in this vital area of the waterfront.

With the anticipated adoption of the Port's Waterfront Plan, we look forward to working with the San Francisco Maritime National Historical Park to ensure that our efforts are integrated and coordinated. Noted below are our comments based on our staff's review of the Draft General Management Plan.

1. Consistency with the Port's Draft Waterfront Land Use Plan (p. 24):

- A. Revise the description of the Waterfront Land Use Plan as indicated: "The Draft plan is the product of [REDACTED] a four-year public planning process conducted by the Port with assistance from a Waterfront Plan Advisory Board."

1

1. The document has been revised.



Received SAFR

OCT 3 1996

Superintendent's Office

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San Francisco, CA 94111
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Wire

COMMENTS

RESPONSES

2. As stated in the draft document, no effect on types or character of land use is expected. A traffic and transportation analysis would be completed before implementation of any vehicular access/circulation or parking proposals. Additional environmental analysis and NEPA documentation would be completed as necessary, based on that further analysis.
3. The document has been revised.
4. The document has been revised to acknowledge this jurisdictional information and the potential economic impact. See response 2 for the need for additional, more specific analysis before implementation of any vehicular access/circulation or parking proposals.

The seven goals include the following:

- (third bullet) provide a diversity of activities **for all San Franciscans and visitors to enjoy**
- (fourth bullet) improve public access along the waterfront
- (fifth bullet) create economic opportunities that reflect the diversity of the San Francisco population

B. Alternative A, Urbanized Aerial

Jefferson Street Vehicular Access: Alternative A would eliminate vehicular traffic and parking from Jefferson Street west of Fish Alley during the peak use season and during peak visitation hours on weekends. The Waterfront Land Use Plan assumes that Jefferson Street would be accessible by vehicles. The EIS should analyze whether reduction in vehicular access would be likely to affect land uses identified in the Waterfront Land Use Plan.

C. Definition of Port Boundary Line (p. 131)

The GMP/EIS land use map shows Port jurisdiction extending west over portions of the Municipal and Fort Mason piers. The Draft Waterfront Land Use Plan shows Port jurisdiction ending just west of the Hyde Street Harbor breakwater. The GMP/EIS map should be corrected.

2. Consistency with Waterfront Land Use Plan Draft EIS:

A. Alternatives A & B: Access and Circulation

The proposal for Alternative A suggests that Hyde and Jefferson Streets should restrict "vehicular traffic and parking during peak visitation hours (10:00 a.m. - 4:00 p.m.) on weekends and during the peak use season" (p.45). The Port of SF owns and maintains seven metered car parking spaces and 6 metered motorcycle parking spaces within a portion of the Jefferson Street right-of-way west of Hyde Street. On average, the Port of SF receives approximately \$40 per week per meter; the meters in the Fisherman's Wharf/Maritime Museum area experience above average usage due to the visitor traffic volumes. The EIS should acknowledge

COMMENTS

RESPONSES

5. As stated in the draft document, Hyde Street Pier was determined ineligible for the national register due to lack of historic integrity. This determination was made in 1981.
6. There would be no addition of new historic ships. Rehabilitation of the Sea Scout base may entail such activities as pile driving. The draft plan calls for an assessment of the base's condition and a structural evaluation to determine the facility's rehabilitation needs. When these needs and subsequent rehabilitation plans/designs are determined, site specific impacts would be evaluated. The document has been revised to include the need for further environmental analysis and NEPA documentation during the project design stage.
7. The park is required by NPS policy to address hazardous materials storage and handling. The document has been revised to acknowledge the need for such a plan and that the park would coordinate with the city of San Francisco and Port of San Francisco in an effort to have the park's plan consistent with the *San Francisco Oil Spill Prevention and Response Plan*.
8. The document has been revised to acknowledge the potential for the re-use of salvaged wood.

4 this jurisdictional information and potential economic impact.

B. Cultural Resources: Hyde Street Pier.

The Draft EIR for the Waterfront Land Use Plan identifies Hyde Street Pier as listed on both the National Register and the California Register. The GMP EIS indicates that Hyde Street Pier was determined ineligible for the National Register due to lack of historic integrity (Table 10, p. 98). The two sets of analyses should be reconciled.

C. Potential Effects on Sea Lions.

Both the Hyde Street Harbor and Waterfront Land Use Plan Draft EIR's identify potential impacts to marine mammals from activities such as pile driving and the addition of new historic ships. Project level analysis of this issue should be provided in the GMP EIS.

D. Water Quality.

The WLUP Draft EIR suggests that the Port work with the City and other agencies to fund an annual update of the San Francisco Oil Spill Prevention and Response Plan. It may be appropriate for the National Park Service to participate in funding the annual update as a water quality improvement measure for this project.

3. Material Acquisition

On page 33, the authors discuss the difficulty in obtaining the timber and lumber material needed to maintain the historic vessels in the SFMNP's collection, citing limitations on the harvest of old growth timber and the requirements for dense Douglas fir of a certain size. The authors do not discuss the potential for the re-use of salvaged wood in this discussion. Several companies in Northern California and the Pacific Northwest specialize in salvaging wood from demolition projects in old buildings. The wood retrieved is typically old-growth Douglas fir or redwood and it is often kiln-dried. Most often this wood, which can include very large structural timbers, is re-milled for use in residential construction and renovation work, where it is highly prized for its quality in finished carpentry. Such lumber may be useful for some of the maintenance work required for the historic vessels. The inclusion of salvaged materials when possible would minimize the impact on natural resources from the proposed maintenance work.

COMMENTS

RESPONSES

4. Hazardous Materials Storage and Handling

There is no discussion in the document about the management of the hazardous materials that are a necessary part of historic vessel maintenance. On page 140, the authors note that the guidelines for historic preservation of vessels allow the use of modern materials where such materials are more effective than traditional materials, and they imply that modern materials will be used where appropriate. Many modern materials used in ship maintenance such as marine paints and varnishes, epoxy resins and metal alloys possess toxic properties and could damage the environment if they are spilled. In addition, some of these materials may be harmful to the people using them if handling improperly. Park workers and volunteers have a right, under state and federal laws, to be informed of the potential hazards associated with the materials they are using.

To address these issues, the EIS document should include a hazardous materials storage and handling plan for the entire park. The desirability of such a plan should be noted on pages 38-39, where other plans are discussed. In addition to addressing the proper handling and storage of all hazardous materials used at the park, this plan should address the issue of hazardous materials source reduction, hazard communication and worker health and safety. The plan could include a public information component to inform visitors and volunteers of the SFMNH's efforts to protect environmental quality and human health.

The Port's Environmental Section staff would be available to assist the SFMNH staff with the development and implementation of a hazardous materials storage and handling plan.

5. Continuity with Current Projects for Hyde Street Fishing Harbor and Pier 45

A. Hyde Street Fishing Harbor (p 24). Please delete the current paragraph describing this project and substitute the following updated information:

"Hyde Street Fishing Harbor and Pier 45 Fishing Industry Facilities - In 1988 the Port Commission proposed improvements to Pier 45 and the construction of the Hyde Street Fishing Harbor to improve the facilities for the commercial fishing industry at Fisherman's Wharf. The project included renovation of fish handling and processing facilities at Pier 45 and a new 88-berth fishing harbor along the east side of the Park Service's Hyde Street Pier. Following the 1989 Loma Prieta earthquake, the Port refocused its efforts to upgrade the fishing industry facilities on Pier 45. The \$11.6 million project is completed and the fishing industry space on the west side of the Pier is over 90% leased. Tenants include some of the major Northern California fish processors and handlers. The Port is working with a

9. See response 8 to the Environmental Protection Agency and response 7 to the Planning Department, City and County of San Francisco.

10. The document has been revised.

- community advisory group to plan the new uses for the east side of Pier 45; the preferred alternative includes fishing industry space as well as space for an educational attraction or event space. The Port completed a Draft EIR for the Hyde Street Fishing Harbor and Sheds A & C in April 1996. The project currently consists of a 60 berth harbor, support facilities such as restrooms, a work dock, and parking. Funding has been identified and the Port intends to begin final design and construction in 1997 following environmental and regulatory approval. The Port has coordinated the design of the harbor berths with the Park Service to ensure that adequate access is provided for historic vessel maintenance activities and the periodic removal of the park vessels to dry dock facilities. This will be incorporated in the Final Environmental Impact Report."
- Hyde Street Harbor (p. 129) - Please update this project description per the above.
- Alternative A - Adaptive Reuse of Fish Alley Building for Rigging Loft
Note that approval by the Port's tenant and the Port would be received for the proposed adaptive reuse of this building as a rigging loft. The Port's Waterfront Plan places a priority on fishing industry uses in Fish Alley.
- Historic Properties (p. 143) - Add discussion of adaptive reuse of Fish Alley Building for use as a rigging loft.
- Proposed street closures (p. 149) - The proposed street closures would adversely affect the Hyde Street Harbor and businesses in Fish Alley. Based on our experience, the Port believes at a minimum, Jefferson Street between Leavenworth and the entrance to the Hyde Street Harbor would have to allow two-way traffic. Therefore, the Port disagrees with the statement on p. 149 that closing a portion of Jefferson and Hyde Streets "would not affect vehicle access and parking for Fish Alley businesses...before and following the peak visitation time frames." The proposed street closures will require a traffic study that includes review by the Port and the Department of Parking and Traffic.
- On pages 149 and 158, the GMP mentions that additional parking and possible mitigation measures to alleviate traffic congestion are expected; however, note that the Hyde Street Harbor Draft EIR has found no significant impacts from traffic.
- Corrections to Boundaries indicated on Existing Conditions Map - This map shows an incorrect boundary line in that no land that lies south of Hyde Street is included in the license, and the amount of water under license may be greater than indicated on the map.

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COMMENTS

RESPONSES

17. The document has been revised.
18. The document has been revised to note that the park would continue to maintain the pier.
19. Access for visitors with disabilities is addressed under actions common to all alternatives.
20. The document has been revised to indicate that the park would support related transportation proposals in the Golden Gate *General Management Plan* and Presidio *General Management Plan Amendment*. These include opening the railroad tunnel under Fort Mason as an access to the maritime park from the Marina District and Presidio and extending the F-line rail system from Fisherman's Wharf west through Aquatic Park to the Presidio.

7. **Potential Acquisition of Hyde Street Pier** - On pages 60, 74 and 83, the General Management Plan (GMP) mentions that the Park Service could seek to acquire the Hyde Street Pier. The GMP should note that this would require State legislative action.

8. **Maintenance of Hyde Street Pier Substructure** - The inspection and maintenance of the Hyde Street Pier substructure should be included in the General Management Plan.

9. **Disability Access** - Is there a reason why the GMP does not address the issue of ADA access?

10. **Fort Mason Tunnel** - During the construction of the box sewer structure along Marina Blvd, the adjacent railroad track was newly rebuilt in the early 1980's and "temporarily" covered over at a cost of \$300,000. This tract connects to the track that leads to the tunnel under Fort Mason. The GMP excluded any analysis of extending the F-Line down Jefferson and through the Fort Mason Tunnel. This is unfortunate in view of the new F-Line construction and the existence of this other track. Note that the Marine Blvd trackage was specifically rebuilt for excursions.

We thank you for the opportunity to comment on the Draft General Management Plan. We look forward to continuing to work with your staff to coordinate our mutual projects and plans. If there are any questions on the above, please contact me at 415.274.0542.

Yours sincerely,



Sharon Lee Polledri
Director of Planning and Development

SLP:at

cc: Dennis P. Bouey
Executive Director

San Francisco Maritime National Historical Park

ADVISORY COMMISSION

October 18, 1998

Mr. Michael Morelli
Denver Planning Captain
Denver Service Center
Denver, CO
Fax: 303-987-6679

Dear Michael:

The San Francisco Maritime National Historical Park Advisory Commission (Commission) held public hearings on August 21 and 22, 1998. Thirty three speakers made presentations and many citizens and organizations sent in written comments. The Commission has reviewed all of this information.

San Francisco Maritime National Historical Park (Park) is an unique entity in the National Park Service (N.P.S.). It has the world's largest collection of wooden hulled vessel in the water. These represent the Pacific Coast's maritime heritage and history. The Park's educational programs include over 22, 000 students a year, many for overnight visits.

After eight years of effort, the General Management Plan (GMP) seems to be less than the Commission had hoped for. This Commission addresses its strongest concern for the lack of funds and priority within the N.P.S., which has lead to the deterioration of the ships. The *Wapama* can never go back in the water. The C.A. Thayer will sink if not repaired soon.

If approved, the Commission agrees that, in general, preferred Alternative A is the desirable plan. This is the opinion of most respondents. The Commission lists specific areas of concern which we feel could be improved.

Historic Ships

The Commission is concerned with the continued deterioration of the vessels. Unfortunately, the funds have been cut drastically during the past years. The future is bleak. The N.P.S. is unwilling to place the repairs for any of the vessels on the current priority list. This is a disgrace. Chief among the priorities of this Park is the maintenance and preservation of this historic fleet. Appropriate Federal resources must be directed towards this mission. New approaches, considering all collaborative opportunities should be considered.

Wapama

The Commission also urges the N.P.S. to encourage and support the "Save the Wapama" group with the idea that it can take over the *Wapama* similar in fashion to the NSLM program for the *O'Brien*. Until such time that the group can assume responsibility

1. The Park Service recognizes that allocation of the substantial funds necessary for major vessel rehabilitation is and will continue to be a major issue. Approval of the *General Management Plan* would not provide any funding, nor would it guarantee that money for the implementation of the plan would be provided. The purpose of the plan is to provide overall guidance for the management, use, and preservation of the park.

Although the general management plan establishes the need and priorities for funding, each major action must compete for funding with other NPS priorities and projects. From year to year, government funding is uncertain, and we are in a time of government downsizing and balanced budgets. Adequate congressional appropriations may not be available. Given uncertain and limited funding, the park would pursue alternative and innovative opportunities for implementing the plan. The proposed partnership agreement to rehabilitate the Haslett Warehouse and generate funds for preservation of the historic ships and other park cultural resources is an example of one such approach. The park would also continue to support agreements and relationships with cooperating organizations and the volunteers-in-parks program that provide assistance and support in various forms.

The document has also been revised to further clarify that the park would pursue opportunities to establish additional partnerships or other cooperative efforts with both the public and private sector to supplement NPS staff and funding where necessary and appropriate.

2. The National Park Service has consulted with the California State Historic Preservation Officer and Advisory Council on Historic Preservation according to the council's implementing regulations found in 36 CFR 800. The parties agreed on a process for addressing the *Wapama* through a programmatic agreement dated April 17, 1997. Minimal measures to slow down deterioration of the *Wapama* would be implemented, but the vessel's underlying

COMMENTS

RESPONSES

for the vessel, the N.P.S. should continue to minimize deterioration) maximize security. The N.P.S. should continue financial support after the group takes over. The Commission urges the N.P.S. to renew its current efforts to maintain *Wapama*.

Epplaton Hall

The Commission recognizes the *Epplaton Hall* may not fit the mission of the Park. The Commission urges the Park to advertise for a responsible and qualified group to assume responsibility for the *Epplaton Hall*. The N.P.S. should continue to maintain the vessel until a suitable home can found.

S.S. Jeremiah O'Brien

The Commission is very supportive of the National Liberty Ship Memorial and its efforts to maintain the *O'Brien*. We encourage the park to develop a program where the volunteers of the *O'Brien* can be covered by the Park's VIP program after ownership is transferred to the NLSM.

Sea Scout Base

The Commission encourages the park to explore the possibility of joint use of the Sea Scout facility by other established youth organizations for sail training. This would be done at times when the facility is not being used by the Sea Scouts. And the Sea Scouts would be involved in the forming of these programs.

These comments are part of the ongoing process. Hearings are scheduled by BCDC and the State Historic Preservation office. We will forward additional comments in December.

Very Truly Yours,



Neil D. Chalkin
Chairman

cc: Congresswoman Nancy Pelosi
Bruce Badrell, Secretary of Interior
Stanley Albright, Pacific West Field Area Director
William Thomas, Superintendent

structural decay would not be addressed. The ship would be dismantled when it could no longer maintained in a safe condition.

Dismantling would be taken only as a last resort. Before implementation, the Park Service, in full consultation with the state historic preservation officer, will explore the widest possible range of alternative measures for preserving the vessel. Such alternatives will include, in priority order, leasing of the vessel, working with local/state/federal government or private agencies to relocate the vessel to a site conducive to preservation and interpretation, or transfer to a federal or state or private entity with the proven capability of funding and carrying out the preservation of the vessel.

If leasing, relocation, or transfer of the vessel was impossible within two years from the date of completion of the general management plan or structural collapse was imminent and the vessel became a safety hazard, the Park Service would demolish the vessel. The Park Service will provide the state historic preservation officer the opportunity to comment on the decision to demolish the vessel. Should the preservation officer disagree, the Park Service will consult according to the programmatic agreement, stipulation IX, dispute resolution.

Before dismantling the *Wapama*, the Park Service will consult with the state historic preservation officer to determine what level and kind of recordation is required for the property. The Park Service will conduct a survey of the vessel and select any hardware or other material that may be used in preserving other vessels in the park that are curated or used for interpretive purposes. The Park Service will ensure that the story of the *Wapama*, including reasons for dismantling, remains a part of park interpretive activities. Salvaged elements may be used to interpret the history of the *Wapama* and steam schooners to the maximum extent possible.

COMMENTS

RESPONSES

3. Under the proposed action the *Eppleton Hall* would be preserved in limited operating condition and would be berthed for public display at Hyde Street Pier.
4. The operational details of the park's VIP program is a management issue outside the scope of this *General Management Plan* and would be addressed based on Park Service policy for such programs.
5. Based on other public comments and consideration by park management, the park would explore options with the Sea Scouts to provide sail training.

COMMENTS

San Francisco Maritime National Historical Park

ADVISORY COMMISSION

DRAFT

DRAFT

DRAFT

October 31, 1986

Mr. Michael Morelli
Denver Planning Captain
Denver Service Center
Denver, CO
FAX: 303-987-6879

Dear Michael:

The San Francisco Maritime National Historical Park Advisory Commission (Commission) is pleased to submit the following comments to supplement the Commission's earlier letter regarding the San Francisco Maritime National Historical Park's (Park) General Management Plan.

Historic Vessels

The Commission believes strongly that because of the immediate hazard to the life of the historic vessels, it is critical that the National Park Service (N.P.S.) ensure that funds for maintaining the ships are included in the NPS priority list for 1987 and subsequent years.

It is the Commission's view that the volunteer program for the ships is integral to the maintenance and presentation of the ships. However, the volunteer program could be strengthened. We believe that things will improve when Park management—especially the ship's management team—decides that volunteers are critical if each of the ships are to be saved.

We feel that the Lewis Ark is not effectively displayed on the Hyde Street Pier. The Commission suggests that the Park investigate a more productive site in the area to enhance its historical significance.

Haslett Warehouse

The Commission urges the N.P.S. to move with all possible speed to develop the Haslett Warehouse.

Other Issues

The parking area at the foot of Van Ness Avenue has approximately 140 parking spaces. Meters could be installed that might generate in excess of \$100,000 per year for the Park as well as provide parking for Park volunteers. This controlled space could also be used for tour bus parking for visitors to the Maritime Museum and Hyde Street Pier.

The Commission encourages the Park to consider enhancing the Victorian Park with large maritime objects.

Sincerely,


Kelly O. Chaitin

Chairman
San Francisco Maritime NHP Advisory Commission

cc: Director Roger Kennedy
Stanley Albright, Pacific West Field Area Director
William G. Thomas, Superintendent
Congresswoman Nancy Pelosi
Secretary of Interior, Bruce Sabott

Building E, First Marine Center San Francisco, California 94133

RESPONSES

1. See response 1 to the October 18 letter from the San Francisco Maritime National Historical Park Advisory Commission.
2. The plan acknowledges the importance of the volunteer program, which would continue to supplement park staff, particularly in the library and areas related to collections management, historic documents, exhibits, administrative offices, small craft shop, and maintenance and operation of the historic ships. The volunteer program would be enhanced where possible.
3. The park believes that under the proposed action, which would retain NPS ownership of the vessel, that greater visibility and visitor interpretation of the Lewis Ark houseboat would best be achieved by display at the Hyde Street Pier.
4. The park expects to solicit proposals from private developers following the completion of the general management plan.
5. Provision of parking meters would fall under the purview of the city of San Francisco, which would collect any revenue generated. The Park Service does not support installation of parking meters within the park but proposes that the parking spaces within the park along Van Ness Avenue be designated with 4-hour parking limits during peak visitation hours to allow more available space for visitors.
6. Victorian Park is an important visual component of the park. The plan proposes that the openness of the park, its urban connection, and its Victorian atmosphere be preserved. Placement of large maritime objects would be allowed provided they did not detract from these characteristics. The planned goal would be to display large artifacts at the maritime museum in the Haslett Warehouse where they could be adequately housed and protected.



THE NATIONAL MARITIME MUSEUM ASSOCIATION

Building 35, Fort Mason, San Francisco, CA (415) 929-0202 fax: (415) 673-5381 e-mail: sfmmma@aol.com

August 26, 1996

Mr. William Thomas, Superintendent
San Francisco Maritime National Historical Park
General Management Plan
Fort Mason, Bldg E
San Francisco, CA 94123

Re: Draft General Management Plan/EIS

Dear Mr. Thomas:

On behalf of the National Maritime Museum Association, a cooperating association to the San Francisco Maritime NHP, I am pleased to have the opportunity to submit the following comments in response to the General Management Plan.

The Museum Association has had a long history with the Maritime Museum. As former founders and current supporters, we are deeply concerned about the Park's future.

We believe that the GMP is a fair presentation of the current state of the Maritime Park and the challenges it faces. For the most part, we agree with the alternatives presented under Alternative A. Outlined below are some of the critical issues that we believe deserve special attention.

1. Historic Ships

We believe the Maritime Park must continue to evaluate its needs in light of what resources it can realistically expect over the next 5 to 10 years. The NPS must come to terms with the enormous cost of maintaining the fleet, set priorities and focus its energies, funding, labor and volunteers toward those vessels that have a chance of being saved.

Mailing Address: P.O. Box 470310, San Francisco, CA 94147-0310

1. See response 1 to the October 18 letter from the San Francisco Maritime National Historical Park Advisory Commission.

COMMENTS

RESPONSES

To this end, we support Alternative B for both the *Wapama* and *Epplenon Hall*. As you know, this would mean that the *Epplenon Hall* would be deaccessioned to another home (we would hope in the Bay Area) and that *Wapama* would be documented and dismantled with her contributing features salvaged. While these decisions don't come easily, we believe they must be made to ensure the preservation of the remaining vessels.

We believe that special attention should be focused on the *Baldutha*, *Eureka* and *CA Thayer*. The *Thayer* is the most challenging of these. The cost is so high and the deterioration so progressed, that financial support from Washington is absolutely critical. From the information we have, we believe that the vessel only has a few years left before she is unsafe. If the NPS does not act in the next two years to secure funding for her restoration she will go the way of the *Wapama*.

If the fleet is to be saved it will take financial resources: leadership and strong management supported by an enthusiastic and skilled group of employees and volunteers—something this plan does not provide. To this end, we strongly support the search for a well-qualified ship manager and support alternative A in its endorsement of making maximum use of volunteers. We further believe that given the "uncertain and limited funding environment" the Park should, with the Association's active participation, seek income outside the Federal budget for ship preservation.

We urge the Park Service to amend the GMP to make provisions which allow for the creation of public/private partnerships to address its needs. We believe partnerships and cooperative efforts with volunteers, nonprofit groups, business and educational institutions could provide valuable assistance to the understaffed and underfunded Park.

As we look to the future, we have some concern that not pursuing the development of shipyard facilities (e.g. at Mare Island) could be detrimental to future care and maintenance of the historic vessels. We would urge the Park Service to continue to explore available shipyard facilities.

2. Hazlett Warehouse

We fully support the proposed alternative for the development of the Warehouse. The building has been idle for far too long. We believe that the preferred alternative presented in the GMP is the only solution which will ensure that the building is put to productive use and will become an asset for the Park.

2. The acquisition of shipyard facilities for the preservation and repair of the fleet of historic vessels is not currently considered economically feasible. However, as noted in the plan, future facility acquisition would remain a possibility should it become economically and operationally practicable.

COMMENTS

RESPONSES

3. Interpretation

We support the preferred alternative regarding enhanced interpretation both in visitor services at the Hyde Street Pier and through changing exhibits at the Maritime Museum. The Park (perhaps through the Association) should seek funding from Foundations, special interest groups and corporations for new exhibits. We believe it is critical that we work to create a museum and pier worth visiting — a museum that becomes part of the fabric of the Bay Area.

Creating a sense of life and activity on the Pier will improve the visitor experience, increase awareness and generate much needed revenue for the preservation of the ships. We support the proposed plan which allows for more participation by our Association in enhancing interpretation at the Pier. We differ from the preferred alternative in asking the Park to reconsider leaving the bookstore in its current location or moving it so as to ensure the best flow of visitors through the store for increased exposure and support for the Park. We endorse the street closure "pedestrian plaza" concept.

Finally, we believe that through the success of the Age of Sail Living History program we have demonstrated the opportunities available through the development of educational programs. We would encourage the Park to add language to the GMP encouraging the growth and active development of these and other community outreach efforts.

4. Other Comments

a) There should be a study of income producing opportunities for the 140 parking spaces within the Park, given the parking shortages for visitors to this area. Metars or attended parking could provide both control of the parking limits so to increase the number of users of the space and develop income for the Park. In conformity with the neighborhood and to increase the number of users, the parking limit should be two hours.

b) The Park should investigate allowing water access to the Pier to allow for ferry or water taxi service.

c) The Park should develop a relationship with tour bus and destination management companies to increase visitation to the Pier. This might require making bus parking available and providing tour guides to serve these visitors.

d) The Park should do a cost analysis comparing the difference between putting the Lewis Ark on a platform off the pier and making her watertight so that

3. The document has been revised.

4. See response 5 to the October 31 letter from the San Francisco Maritime National Historical Park Advisory Commission.

5. The document has been revised to state that the park would support related transportation proposals in the Golden Gate National Recreation Area *General Management Plan* and Presidio *General Management Plan Amendment*. These include establishment of a system of water shuttles accessing park sites in San Francisco Bay.

6. The document has been revised to indicate that the park would explore opportunities to work with interested tour operators to enhance and broaden visitation opportunities to the park.

7. The Park Service believes that securing the Lewis Ark adjacent to Hide Street Pier out of the water would be the most practical and cost-effective method of preserving and displaying her, particularly given other funding priorities.

COMMENTS


RESPONSES

7 she could be moored in the water as it would increase the integrity and interest in the exhibit.

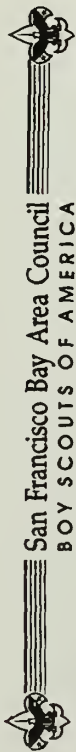
8 e) The Park should consider the possibility of placing large maritime artifacts in Victorian Park to give the area a "maritime feeling".

Thank you for the opportunity to comment. We are committed to helping the Park accomplish its goals and look forward to receiving the Plan in its final form.

Sincerely,


Kathy L. Lohan
Executive Director

8. See response 6 to the October 31 letter from the San Francisco Maritime National Historical Park Advisory Commission.



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August 16, 1996

Received SAFR

Superintendent William G. Thomas

AUG 22 1996

National Park Service

Superintendent's Office

Building E, Lower Fort Mason, Rm. 265

San Francisco, CA 94123

Dear Superintendent Thomas:

Bob Dillard and I have both received the draft of the general management plan for the San Francisco Maritime National Park. Because both of us will be in San Diego the week of August 18, we will not be able to participate in your meeting on August 21 or August 22, 1996. I do find that I should comment to you, in writing, about the draft plan.

Bill, as you know, the San Francisco Bay Area Council has operated the Sea Base in its current location since the 1940's. Since we do not have title to the property, nor do we have a long term lease, we are unwilling to invest large amounts of resources to improve the facility. All of us would agree, however, that the facility does need rehabilitation, and does not represent the Park Service, nor the Boy Scouts of America well. Although we have cleaned up the base, and have recently painted and re-roofed the building, I am not willing to have our Council's name or identification anywhere. It is an attractive, tired, worn out facility, with a great location.

Plan Alternatives 'A' and 'B' states, "The Sea Scout base would be rehabilitated for continued use by the San Francisco Sea Scouts. The Park would explore options with several organizations to provide sail training at the Sea Scout base. They would establish appropriate agreements with the Sea Scouts and other organizations for rehabilitation, maintenance, operation and use of the building." Alternative 'C' states, "The Sea Scout base would be rehabilitated for continued use by the San Francisco Sea Scouts under an appropriate agreement for the rehabilitation, operation and maintenance of the building." Alternatives 'A' and 'B' imply that we would lose partial control of the facility in exchange for investment from an outside group. I assume that Alternative 'C' would mean that we would maintain control over the facility, and that we would be responsible for upgrading the facility.

The San Francisco Bay Area Council would prefer Option 'C'. However, until we can secure a long-term lease, or title to the Sea Base, the facility will continue to be our last priority for funding. We are, however, willing to discuss Options 'A' and 'B', provided that they do not negatively impact on the use of the facility by our Sea Scout Ships.

The Sea Scouts can provide much to the Park, and truly partially fulfill the educational mission of the park. We can play a larger role, and are willing to seek a new partnership with the SFNMP.

Sincerely,

Stephen E. Barnes
President & Scout Executivecc: Bob Dillard
Michael Strain

BAY FRANCISCO BAY AREA COUNCIL #28

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National Parks and Conservation Association

PACIFIC REGIONAL OFFICE

27 September 1996

Received SAFR

SEP 30 1996

Superintendent's Office

William Thomas
Superintendent, San Francisco Maritime National Historic Park
National Park Service
Building E, Fort Mason
San Francisco, CA 94123

RE: SAN FRANCISCO MARITIME NATIONAL HISTORIC PARK DOMP/EIS

Dear Superintendent Thomas:

The National Parks and Conservation Association (NPCA) is America's only private nonprofit citizen's organization dedicated solely to protecting, preserving and enhancing the U.S. National Park System. NPCA was founded in 1919 and currently has over 450,000 members, including over 90,000 in California.

NPCA appreciates the opportunity to submit comments on the general management plan of the San Francisco Maritime National Historic Park. NPCA congratulates you on your recent museum accreditation. It is a well-earned distinction and we hope it assists you in garnering more recognition and support.

We urge you to construct a final General Management Plan that is a standard bearer at the highest level and steers the park to realize its full potential. The park is both a static record of the past and a vital repository of past craftsmanship. An effective plan needs to preserve and protect the ships as well as the skills that created them. Between its resources and location, the park has the capacity to draw upon the large number of visitors to San Francisco's waterfront to increase visitation. Furthermore, by deepening



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community relations, the park can expand opportunities for partnerships and volunteer involvement and thereby boost resource management and interpretive potential. This combination of strategies will help the park improve management and build a larger constituency. We are pleased to see that the plan reaching in this direction as the preferred alternative demonstrates a clear interest in protecting and promoting the park's values.

The Ships:

We realize the challenge of identifying and prioritizing the ships' needs, as the park manages a fleet of diverse ships in varying conditions. To develop the means to address these needs, NPCA suggests that planning be grounded in the principles advanced in the Secretary of Interior's "Standards for Historic Vessel Preservation Projects." These standards identify the basic goal of preservation as "maintaining intact a vessel's historic form, integrity and material" and that protection "shall safeguard the physical condition of a vessel from further deterioration or damage caused by weather or other natural, animal or human intrusions." Preventive measures which can decrease the need for more expensive rehabilitation down the line should be a priority.

The Inventory and Condition Assessment Program (ICAP) process in the document holds some promise, though we are concerned that this process may restrict resource management potential. Early in the plan is the assertion that the "plan's approach should be flexible and changeable in relation to an uncertain and limited funding environment for historic vessel preservation projects." Furthermore, the ICAP is influenced by "the park's limited staff and funds" and readily responsive to "changes in funding and priorities." We urge the park keep planning centered around the park's mission and the Secretary of Interior's standards. Instead of anticipating shortfalls, management should explore strategies such as the development of alternative funding and enhanced volunteer development to allow the plan and park to realize its full potential.

As park management realizes planning needs to be timely, cost-effective and guided by knowledgeable experts. Fortunately, San Francisco is home to a wealth of maritime experts, some of whom have the privilege of being on your staff and Advisory Commission. The park should exploit the potential of this on-hand expertise and actively involve outside experts to inform and focus resource management. This collection of talent should also be deployed to help build skills and make the most of staff and volunteer efforts.

COMMENTS

RESPONSES

NPCA is concerned about the deteriorated condition of the Wapama and what this may mean for her ultimate disposition. As such, we would like the plan to more clearly explain why none of the alternatives provides for more aggressive restoration. NPCA considers this to be a narrower range of alternatives than is called for under the National Environmental Policy Act. We would like the park to at least assess the prospects for the Wapama if she is stabilized. Though her restoration may be difficult using current technology, future developments akin to the ground broken by the use of barge, could make restoration of the Wapama more realistic.

1

The Wapama also may present an opportunity to engage in the type of innovative management which will help the park augment its in-house resources. We understand the park does not currently have adequate resources to address the Wapama's needs, but it is our understanding that there is a well-developed coalition of citizens who are interested in taking responsibility for restoring and extending the lifespan of the Wapama as an intact vessel. This is an example of the kind of opportunity that exists by working with the community and public-private partnerships to strengthen resource protection.

2

The decision to dismantle the Wapama is important as it establishes a precedent for how these decisions will be made in the future. If the Wapama is to be finally dismantled, the plan should articulate a vision for how the splendor of the Wapama can be showcased and interpreted at the park. For example, she could be a striking feature at the entrance of the park that could excite the curiosity and interest of passers-by and incoming visitors.

Interpretation:

As mentioned earlier, the park's outstanding feature is its capacity to offer several windows into maritime history. According to the park's enabling legislation, the park is to be managed to "preserve and perpetuate knowledge and understanding of American maritime history and to provide for public understanding and enjoyment of maritime history." The Secretary of Interior's Guidelines advise that the "general public's understanding and appreciation of a vessel will largely be determined by the degree and effectiveness of the interpretation provided."

Table 10, which lists the significance of the park's resources in 1 to 2 sentences, illustrates the ships' incredible interpretive potential. Each ship represents fascinating technological and social historical

1. Restoration of the *Wapama* is addressed under the alternatives considered but dismissed from further consideration.
2. See response 2 to the October 18 letter from the San Francisco Maritime National Historical Park Advisory Commission.

developments and these features should be highlighted for visitors. In developing park interpretation, planners should keep in mind that their audience is largely composed of families and foreign visitors. As a result, exhibits will be more effective if they are interactive and/or make maritime history come alive. By exciting the imagination of visitors, the park will better guide them towards an understanding of the wealth of maritime history and the ships they are exploring. For example, having better interpretation about the history and circumstances of each ship will help transport the visitor to the time and atmosphere that the ship is preserving.

The partnership with the National Maritime Museum Association already provides several opportunities for this such as the Environmental Living Program and the annual Festival of the Sea. We urge you to continue to work with this and other organizations to pursue park protection, interpretation and support.

Park Design:

NPCA enthusiastically supports the proposed alternative's objective of opening up the entrance to the pier to lure visitors to the area. Developing a strong visual and physical connection between the heavily used cable car turnaround and the park is an excellent strategy to engage and draw visitors into the park.

Additionally, we suggest you pursue relocation of the entrance gate closer to the ships, so that visitors may be drawn more directly towards the ships, encouraging further exploration.

We also support the establishment of "an overall concept theme" that provides "an appropriate historical setting for the display and interpretation of the historic vessels and maritime activities" as well as "integrate[s] the pier with adjacent park areas." Establishing a 19th century atmosphere and using a consistent design throughout the park's features will provide cohesiveness for visitors. Along these lines, we encourage the park to prioritize projects which strengthen connections between the various parts of the park, i.e. the museum and the aquatic park. For example, interpretive signs could be posted between Fort Mason and the Hyde Street Pier to help visitors understand the connections between the various facilities.

Public Outreach:

NPCA recommends that the park pursue additional ways to funnel people to the park. The fact that the Festival of the Sea draws between 30,000 and 40,000 visitors illustrates the capacity this park has to draw crowds when efforts are made to focus the public eye on the area. We also encourage the park to explore the various avenues to make the public aware of the park, through visitor bureaus, publicized events, free

press and other channels of public information. We also recommend that the park study and communicate closely with the management of other maritime parks to identify strategies that could be imported to improve park publicity and interpretation.

Enhanced visitation, when properly managed, translates into increased revenue and public support.

Maximizing public awareness of the park's intrinsic qualities would reap great benefit for the park. The resources invested in this type of venture will generate a vocal and supportive constituency.

Partnerships/Volunteers:

NPCA is impressed by the volunteer program already developed for the park. NPCA encourages the park to continue to expand that program through publicity and working with other organizations affiliated with the museum. Past history has shown that this park's resources can attract committed and enthusiastic support. To assist the park with preserving the ships, we endorse the "program of training in maritime skills directed at staff, volunteers and the public...to ensure the ongoing availability of these crafts for preservation of park resources and as a part of the overall educational mission of the park." Having a larger and trained workforce will play two critical roles: maintenance and restoration of the ships; and creation of a living and working exhibit of the craftsmanship that made these ships possible. To bolster participation, we suggest that this program be intertwined with the development of public relations. Such creative management strategies will attract funding, as donors will see their outlay magnified by the park's well-organized system of attracting donated time, services and supplies.

Funding:

Clearly funding directly affects the capacity of the park to accomplish its mission, as "unsystematic funding for vessel preservation and maintenance has resulted in an accumulation of deferred work" where portions of ships "have deteriorated to the point where major restoration is necessary." This is again where public-private partnerships can work, through the leasing of the Haslett Warehouse, fundraising in concert with the National Maritime Museum Association, harnessing volunteer efforts and enhancing maritime community involvement.

Haslett Warehouse/Museum:

The vision for the museum described in the plan is excellent. NPCA supports improvement of the museum facilities to make them more effective and accessible. However, the plan is unclear as to the actual timeline

and plan for the transfer of the museum to the Haslett Warehouse. It is our understanding that development of the Haslett Warehouse will initially require dependence upon commercial development and revenue-generation before the NPS can fully use the facility for its needs, including the transfer of the museum. We would like greater clarification about the terms and timeline of the conversion of the building. How will appropriate development be identified? In the document, there is reference to "an emphasis on uses compatible with surrounding commercial uses." Under what parameters? When will the park begin receiving revenue from the enterprise? What is the timeline for the park's own plans and what are the limiting variables? We expect final negotiations will strictly adhere to standards that protect the ability of the park to achieve its mission. We also don't fully understand how the park can plan for its own needs when "the actual terms of the partnership agreement... would be based in part on the financial feasibility of the developer to cover operating costs plus generate enough of a net operating surplus to cover capital cost and provide... profit." In other words, it appears the developer's circumstances could shape the leasing agreement more substantially than the park's mission. We also understand that the museum is anticipated to be relocated to Haslett in 20 to 30 years, or beyond the scope of the plan. This is not made clear in the description of the project. If the museum is not to be moved for a long period, the museum still needs a strong interim re-development plan where exhibits are enhanced, and interpretation is designed to strengthen the links between the museum and the rest of the park.

3

On a final note, we believe the plan should explain how priorities are established between the park's many needs. In the case that the plan is not fully funded, it will help management prioritize in a way that best achieves the plan's objectives. The document should also clearly explain the anticipated timeline of plan implementation. Merely placing projects in either a short-term or long-term categories in appendix B does not clearly illustrate the plan's chronology.

4

Again, NPCA thanks you for the opportunity to play a role in the development of the General Management Plan for San Francisco Maritime National Historic Park. If there is any way in which we may be of assistance, please do not hesitate to contact us.

Sincerely,

Brian Huse
Director, Pacific Region

3. Specifics regarding the long-term lease of the Haslett Warehouse would depend on the actual terms of the partnership agreement. The park expects to solicit proposals from private developers following completion of the general management plan.
4. Implementation of proposed actions would require logical phasing for the many improvements and resource preservation actions called for in the general management plan. The prioritization, general timing, and cost estimates of implementation of proposed actions are shown in appendix B. More detailed phasing of actions and costs would be developed through implementation plans and other more specific management plans such as the resource management plan and the historic vessel preservation plan.

COMMENTS

RESPONSES

COMMENTS
ON
DRAFT GENERAL MANAGEMENT PLAN
ENVIRONMENTAL IMPACT STATEMENT
JUNE, 1996

SAN FRANCISCO MARITIME
NATIONAL HISTORICAL PARK
SAN FRANCISCO, CALIFORNIA

SEPTEMBER 27, 1996

SUBMITTED BY:
FRIENDS OF AQUATIC PARK
Contact:
Meg Reilly
875 Filbert Street
San Francisco, CA 94133
(415) 281-0421
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COMMENTS

RESPONSES

The undersigned, as **FRIENDS OF AQUATIC PARK**, make the following comments regarding the Draft General Management Plan ("Plan")/ Environmental Impact Statement (EIS).

1. San Francisco's Aquatic Park has a long history as a natural and developed site of aquatic recreation - primarily swimming and rowing. We believe that the primary and priority uses of Aquatic Park lagoon and beach should continue to be swimming and rowing. Any action, inaction or use which conflicts with or jeopardizes continued use of Aquatic Park lagoon and beach for swimming and rowing is contrary to public interest.

2. We oppose any plan, action or inaction which jeopardizes continued location or operation of Dolphin Swimming & Boating Club or the South End Rowing Club in Aquatic Park. Both are public membership non-profit organizations, which, through membership and day use programs, provide primary contemporary ties with historic swimming and rowing activities in Aquatic Park.

3. The Plan acknowledges that the Aquatic Park lagoon and beach are important cultural and natural resources of the park. The Plan is deficient because it fails in all material respects:

- A. to acknowledge the historic and current uses of Aquatic Park lagoon and beach for aquatic recreational swimming and rowing as primary and priority uses;
- B. to provide management plans, strategies, or analysis for future park management of Aquatic Park lagoon and beach that recognize, preserve and protect the lagoon and beach resources for the primary purposes of aquatic recreational swimming and rowing;
- C. to incorporate, accommodate, protect, foster, encourage or otherwise commit to work cooperatively to insure continued current and future uses of Aquatic Park lagoon and beach for the primary purpose of aquatic recreational swimming and rowing.

4. The Plan/EIS contains no meaningful analysis of the historic or current uses of Aquatic Park lagoon and beach for aquatic recreational swimming and rowing. Accordingly, the Plan/EIS is essentially void of the necessary analysis of the environmental setting and conditions in which those uses occur now and in the future. The Plan/EIS is equally void of the necessary analysis and mitigation (or avoidance) of environmental impacts of any Plan Alternative (A, B, C) on aquatic recreational swimming and rowing, and on the enjoyment, health and safety of people who engage in these activities.

5. Regarding changes in traffic flow and parking, particularly on the west terminus of Jefferson Street and on lower Van Ness Avenue, we object to loss of vehicle accessibility and parking. In that regard, the Plan/EIS fails to consider the operational, emergency and safety needs of facilities located on Jefferson Street west of Hyde Street. In addition, the Plan/EIS fails to consider and meet requirements of the Americans With Disabilities Act, particularly with respect to the substantial elderly population which frequents (as opposed to "visits") facilities located on Jefferson Street west of Hyde.

6. The Plan/EIS only addresses the needs of and impacts on park "visitors". It fails to distinguish or analyze the needs of and impacts on people, organizations and programs that utilize Aquatic Park and environs on a continuing basis.

5. We request that the draft Plan/EIR be amended to cure the above- stated deficiencies.

1. The historic and current use and development of Aquatic Park are acknowledged in the "Affected Environment" section of the document. The plan calls for the continuation of existing aquatic recreational uses, such as swimming, rowing, wading, and mooring of sailboats. All aquatic recreational activities within the lagoon would be managed to ensure the health and safety of all users. The park would encourage the cooperation between user groups. Boating would continue to be managed in cooperation with the city (including additional restrictions if necessary) to ensure that boating continues in a manner compatible with other users and safe for swimming. Please note that the plan has been revised to indicate that the park would work with the Sea Scouts to provide sail training at the Sea Scout base. This would be a continuation of an existing use that has been and would continue to be managed to ensure safe conditions and protection of park resources.

2. See above response. The plan would not alter current recreational uses within Aquatic Park, and uses would continue to be managed to ensure the safety of all users. As noted in the document, impacts associated with any work within the lagoon are expected to have minimal potential for pollution generation. Placement of potential fill in the form of new/replacement dock pilings would comply with water quality standards required by sections 404 and 401 of the Clean Water Act. The plan also notes that other potential sources of water pollution from the use and operation of park facilities would also be avoided or mitigated. The plan has been revised to clarify that further environmental analysis on site specific impacts and subsequent mitigation to specifically address any water quality issues would be completed during the project design stage. See response 6 to the Port of San Francisco and responses 1, 5, 6, and 10 to the Environmental Protection Agency.

3. Proposed road closures would only be in effect during peak hours on weekends and during the peak use season. Club members and other park users could use public parking spaces during road closures. The plan would not preclude access for emergencies or

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eliminate access for deliveries or special events. A traffic and transportation analysis would be completed before implementation of any vehicular access/circulation or parking proposals. See response 14 to the Port of San Francisco. At that time, the park can request that the city determine if additional handicap parking spaces are required.

4. The plan would not alter current recreational uses within Aquatic Park. See responses above.

COMMENTS

RESPONSES

SOUTH END ROWING CLUB
500 Jefferson Street
San Francisco, CA 94109

Received SAFR
SEP 27 1996
Superintendent's Office

September 27, 1996

Superintendent, San Francisco
Maritime National Historical Park
General Management Plan
National Park Service
Building E, Fort Mason
San Francisco, CA 94123

Dear Superintendent:

I am writing on behalf of the South End Rowing Club and its members to offer our comments on the Draft General Management Plan / Environmental Impact Statement for the San Francisco Maritime National Historical Park ("the Plan"), dated June 1996.

The Plan fails adequately to analyze the impacts of the proposed actions as required by the National Environmental Protection Act. In particular, the Plan fails to give any meaningful consideration to the impact of the proposed actions upon the current and historical use of Aquatic Park for public recreation. Aquatic Park was created to serve a singular purpose -- to provide a dedicated venue for swimming, rowing and other aquatic recreation. It cannot be treated for planning purposes as simply a scenic element in the maritime park. The concept of the maritime park presented in the Plan must be expanded to include and protect aquatic recreational uses (see Plan, at p. 30), and such uses must be given priority in any planning for future use or development of the area.

The Plan also fails to take into account the status of Aquatic Park and the swimming clubs as cultural and historical resources. As the Plan itself notes, San Franciscans have used Black Point Cove for swimming and rowing since the 1860s. (See Plan, at pp. 96-97.) Aquatic Park is the only place in the City developed and set aside for the general public to enjoy the Bay through such activities. The South End Rowing Club and the neighboring Dolphin Swimming and Rowing Club have been an integral part of the historical and recreational uses of Aquatic Park. The Plan must address the impact of the proposed actions upon such resources. In its current version, the Plan does not do so.

1. See response 1 to the Friends of Aquatic Park.

Letter to Superintendent, San Francisco
 Maritime National Historical Park
 Page 2
 September 27, 1998

Without conceding the adequacy of the Plan, the South End Rowing Club generally supports the concepts included in Alternative A of the Plan. However, we do object to two specific elements of the proposal.

First, the discussion of Alternative A includes a statement that the South End and the Dolphin Clubs "would be encouraged to modify the facades of their buildings on Jefferson Street to an architectural style that would complement the Victorian design theme for the pier and Victorian Park." (See Plan, at p. 47.) The club buildings are historic facilities, dating back to the turn of the century, and should not be casually altered to accommodate subsequent design schemes. Further, the South End could not comply with such a request unless outside funding were made available. The club has just undergone costly renovations, at its own expense, to upgrade the women's locker room and showers, and to ensure full compliance with the Americans With Disabilities Act. The Dolphin Club has also made similar renovations to its facilities.

Our second concern with Alternative A is that the proposed renovations would result in the loss of parking spaces and vehicle access on Jefferson Street in front of the swimming clubs. If the Plan is adequately to address the impact on aquatic recreation provided through the swimming clubs, as we contend the Plan must, then the Plan must provide for mitigation of these impacts, such as ensuring vehicle access for deliveries, special events and emergency services. Parking and access must also be preserved for the many elderly and disabled patrons of Aquatic Park and the swimming clubs. The Plan should also contain a formal commitment to preserving public parking on Hyde Street between Jefferson and Beach Streets prior to 10:00 a.m., as indicated in the Plan (see Plan, at p. 48), and to preserving the Club's access over the Hyde Street Pier to the shorefront portion of the Club's grounds.¹

Our second purpose in writing is to voice our strong objections to Alternative B, and specifically to the suggestion that the South End and Dolphin Clubs be relocated to the other end of Aquatic Park.² (See Plan, at pp. 61, 65.)

The Plan does not contain any meaningful analysis of the proposed relocation. This failure is material for several reasons. First, the site identified for the relocated clubs at the west end of the cove is not appropriate for swimming. The Plan contains no analysis of changes in water quality associated with the Plan and with such a move.

¹ In connection with these parking and access concerns, we suggest that instead of moving the maritime park bookstores to a new building in the northeast corner of Victorian Park, the Park Service consider locating the bookstores in the renovated Haelett Warehouse.

² We note that the Alternative B maps, following pages 62 and 68 of the Plan, only state that the Park Service would "encourage" the relocation of the swimming and rowing clubs. . . . [Emphasis added]

2. The swimming and rowing club buildings have not been determined to hold official local or state historical designation, nor are they listed on the national register as historic properties. It has been noted that the clubs relocated their structures from the west side of the cove to their current location in 1926, and that the clubs certainly possess a historical organization and recreational use of the Aquatic Park lagoon. The plan states that the Park Service would encourage the clubs to modify the facade of their buildings to an architectural style that would complement the Victorian design theme of the pier and Victorian Park. This might include consideration of exterior alterations that would return the structures to their earlier historic character, which might allow them to obtain historic designation. It would be entirely up to the discretion of the clubs as to whether they would be willing or able to make such changes.

3. See response 3 to the Friends of Aquatic Park.

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Maritime National Historical Park
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The absence of such analysis is particularly significant in light of the existing water quality problems in the west end of the cove, and in light of the suggestions in the Plan to increase fill in the cove, with the prospect of changes in tidal action, and the suggestion to promote additional boat traffic in the cove, with its attendant pollution.³

As the map following page 62 of the Plan indicates, the site is not located on a beach, making it difficult for inexperienced or physically restricted swimmers to enter and leave the cove. Many older patrons of the swimming clubs cannot be expected to jump off a pier or climb up and down a ladder in order to enter the water. A beach entry is also needed for many types of races and special events sponsored by the swimming clubs.

The site is also not appropriate for rowers. The west end of the cove is shallow, and at low tides there are large amounts of rocks and rubble exposed. Because the Club operates rowboats of various sizes and styles, we do not keep boats moored in the cove. We therefore would need a far longer pier than the one indicated in the map, extending beyond the rubble at low tide, to launch club boats.

The proposed site may simply be too crowded to accommodate both the swimming and rowing clubs, and the expanded operations of the Sea Scouts anticipated under the Plan. (See Plan, at p. 73.) The City has adopted numerous restrictions on boating in the cove to make the area safe for swimming. There will be increased hazards for swimmers if the Park Service does arrange to use the adjacent Sea Scouts base as a site for expanded programs of sailing instruction. (*Ibid.*) Swimmers in the water can be hard to see under the best of conditions. The combination of increased boat traffic and inexperienced skippers will leave no margin for error. The Plan fails to analyze how these increased risks will affect the use of the cove for recreational activities.

The stated reason for relocating the clubs is to open up views of the maritime park. Constructing facilities and piers at the west end of the cove sufficient to accommodate the two clubs and their operations would be far more visually obtrusive than leaving the clubs where they are. Currently, the club buildings are part of the developed portion of the wharf area. Relocating them to the proposed site will place an extensive new development in the middle of an otherwise open sweep of shoreline between the Hyde Street Pier and the Sea Scouts base. The Plan fails to analyze the visual impact of relocating the swimming clubs as suggested.

³ The proposal to increase fill in the cove in and of itself requires further analysis in terms of its impact on preservation of the cove as a natural resource, and its impact on use of the cove for recreational purposes.

4. See response 2 to the Friends of Aquatic Park.
5. See response 1 to the Friends of Aquatic Park.
6. See response 1 to the City and County of San Francisco, Recreation and Park Department.

COMMENTS

Letter to Superintendent, San Francisco
Maritime National Historical Park
Page 4
September 27, 1986

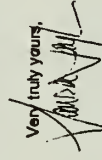
The proposal also fails to analyze the impact of such a move on the swimming clubs as historical and cultural resources. Much of the recent development of the Fisherman's Wharf area is dictated for its lack of historical context. The clubs and their buildings provide a rich and vital link to the past. They are part of the living history of the Bay, part of what draws people to the San Francisco waterfront.

Finally, the entire proposal to relocate the clubs may be practically and politically impossible. The land on which the club buildings sit is owned by the City, and the Park Service may only acquire such property by donation. (See Plan, at pp. 13-14.) There is no indication in the Plan that the City would be willing to donate the property, and such willingness is unlikely in light of the City's past support of the swimming clubs and recreational uses of Aquatic Park. (See, for example, San Francisco Board of Supervisors Resolution No. 1115-85.)⁴ Alternative B does not address this issue in its discussion of necessary boundary adjustments and property acquisitions. (See Plan, at pp. 73-74.) In addition, as discussed above, relocation would require the construction of significant new structures and larger piers. There is no basis for assuming that the Bay Conservation and Development Commission would approve such a proposal.⁵ Relocation would also be prohibitively expensive. The clubs are self-supporting and could not bear such an expense. There is no indication in the proposal of any other source of funding for relocation.

The analysis of Alternative B is grossly deficient on all these points. The only acknowledged impact on the clubs is that "[t]he relocation of the swimming and rowing clubs to the west side of Aquatic Park would result in unobstructed views of the Bay and the historic ships." (See Plan, at p. 157.) The clubs, and the general public, deserve a more thoughtful analysis. Such an analysis would reveal that the proposal to relocate the swimming clubs would be totally inconsistent with the historical and recreational uses of Aquatic Park.

We look forward to working with you on these issues, and thank you for your attention to these concerns.

Very truly yours,


LAURA TAYLOR
President, South End Rowing Club

⁴ In connection with this point, we are disturbed by reports that the Park Service has asked BCDC for a consistency determination on the Plan prior to finalizing the draft environmental impact statement on the Plan.

RESPONSES

7. See response 2 above. Early history of the swimming and rowing clubs include the construction of the Dolphin Club at the foot of Van Ness Avenue around 1895 and the relocation of the South End Club to the same location in 1909. They relocated to their current location in 1926. Both buildings display substantial modifications to their exteriors, and without a determination, it is unclear whether either building retains enough historical integrity to qualify for national register status. There is no anticipated impact on historic properties associated with their relocation under alternative B.
8. A boundary adjustment would not be required for the relocation of the clubs under alternative B. The document has been revised to note that a lease agreement would be established by the Park Service with the clubs for use of the new location within the park. Please note that the proposed action maintains the clubs in their current location adjacent to Hyde Street Pier as identified in the Golden Gate National Recreation Area *General Management Plan Amendment*. The option of relocating the clubs was included in this document to explore the possible range of alternatives for enhancing the Hyde Street Pier and the Hyde Street/Jefferson Street intersection for pedestrian access and use.

COMMENTS

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Received SAFR
SEP 26 1996
Superintendent's Office

September 27, 1996

COMMENTS
ON
DRAFT GENERAL MANAGEMENT PLAN
ENVIRONMENTAL IMPACT STATEMENT
SAN FRANCISCO MARITIME NATIONAL HISTORICAL PARK
JUNE 1996

SUBMITTED ON BEHALF OF:
DOLPHIN SWIMMING AND ROWING CLUB

By: Meg Reilly
502 Jefferson Street
San Francisco, CA 94109
(415) 281-0421
(415) 777-0244 Fax

September 25, 1996
c:\msg\maritime\pfa\comments.1

1. See response 1 to the Friends of Aquatic Park.
2. See responses 1, 2, and 3 to the Friends of Aquatic Park.

INTRODUCTION

Unless otherwise noted, parenthetical number references refer to page numbers of the Draft General Management Plan/Environmental Impact Statement San Francisco Maritime National Historical Park June 1996 (the "Plan/EIS").

SUMMARY OF CONCLUSIONS

I. THE PLAN/EIS IS DEFICIENT IN THE FOLLOWING RESPECTS:

A. IT DOES NOT IN ANY MEANINGFUL WAY RECOGNIZE AQUATIC PARK LAGOON AS A NATURAL RESOURCE. AS A CONSEQUENCE, THE PLAN/EIS FAILS TO CONTAIN ANY MEANINGFUL MEASURES DESIGNED TO PRESERVE, MANAGE AND INTERPRET THE NATURAL RESOURCE FOR PRESENT AND FUTURE GENERATIONS, AND FAILS ENTIRELY TO DISCLOSE, ANALYZE, AVOID AND/OR MITIGATE POTENTIAL ENVIRONMENTAL CONSEQUENCES OF PLAN ALTERNATIVES ON THE NATURAL RESOURCE.

B. IT DOES NOT IN ANY MEANINGFUL WAY RECOGNIZE THE HISTORIC AND CURRENT AQUATIC RECREATIONAL USES OF AQUATIC PARK LAGOON PRIMARILY FOR BAY SWIMMING AND ROWING, EVEN THOUGH AQUATIC PARK LAGOON IS A PROTECTED ELEMENT OF THE AQUATIC PARK HISTORIC DISTRICT (listed on the National Register of Historic Places and designated as a national historic landmark). THE PLAN/EIS FAILS TO RECOGNIZE RECREATIONAL SWIMMING AND ROWING IN THE LAGOON AS IMPORTANT CULTURAL RESOURCES. THE PLAN/EIS FAILS TO RECOGNIZE, FOSTER, OR MAKE ANY ATTEMPT TO INSURE COMPATIBILITY OF PARK PLANS WITH THE JOINT MISSION AND ROLE OF THE DOLPHIN SWIMMING AND ROWING CLUB AND THE SOUTH END ROWING CLUB, IN COOPERATION WITH THE CITY AND COUNTY OF SAN FRANCISCO, OF PROVIDING BAY AQUATIC RECREATIONAL OPPORTUNITIES TO THE PEOPLE OF SAN FRANCISCO AND THE BAY AREA IN GENERAL. AS A CONSEQUENCE, THE PLAN/EIS FAILS TO CONTAIN ANY MEANINGFUL MEASURES DESIGNED TO PRESERVE, MANAGE AND INTERPRET THE LAGOON FOR ITS HISTORIC AND CURRENT AQUATIC RECREATIONAL USES IN A MANNER WHICH INSURES CONTINUATION OF SWIMMING AND ROWING. MOREOVER, THE PLAN/EIS FAILS ENTIRELY TO DISCLOSE, ANALYZE, AVOID AND/OR MITIGATE POTENTIAL ENVIRONMENTAL CONSEQUENCES OF PLAN ALTERNATIVES ON THE LAGOON'S CURRENT AND FUTURE CULTURAL RESOURCES USES OF SWIMMING AND ROWING.

C. BY FOCUSING ON PASSIVE TOURIST AND NON-RECURRING "VISITOR" RECREATION (e.g. looking at the Bay, site seeing, strolling), AND FAILING TO DISTINGUISH EXISTING ACTIVE RECREATIONAL USES IN THE AREA (e.g. swimming, rowing), THE PLAN/EIS FAILS TO TAKE A "HARD LOOK" AT TO DISCLOSE AND ANALYZE, AND TO AVOID AND/OR MITIGATE THE ENVIRONMENTAL

CONSEQUENCES OF A NUMBER OF ACTIONS DESCRIBED IN THE PLAN/EIS INCLUDING WITHOUT LIMITATION:

- loss of vehicle access and parking and the consequences on the businesses, facilities and existing recurring users who will be affected, particularly, elderly and handicapped populations;

- plans which increase employees and visitors and the competing parking demands they create at "peak times";

- Bay fill in Aquatic Park lagoon;

- use and management of Aquatic Park lagoon and surrounding area for purposes and in a manner which does not encourage, and in some cases is not compatible with, swimming and a good water quality environment;

- compatibility of rehabilitation/rebuild and new uses of Sea Scout base with the continued existence and operation of the Sea Scouts, the Dolphin Club and the South End Club

- compatibility of relocating the Dolphin and South End Clubs with the continued existence and operation of those organizations and on the aquatic recreational programs those organizations offer to the public in Aquatic Park and the Bay in general.

COMMENTS

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1817 RICHARD PEKEINEY
JACKSON ST
SAN FRANCISCO
CA 94109

20 Sep 1996

Superintendent, San Francisco Maritime National Historical Park
General Management Plan
National Park Service
Building E, Fort Mason
San Francisco, CA 94123

Dear Sir,

Below are my general comments on the Draft General Management Plan/Environmental Impact Statement (GMP) dated June 1996, followed by a list of specific examples. I am well aware of the enormous amount of work required to produce this document and wish to commend the park for generating this document. Together, the GMP and the Resource Management Plan 1996 (RMP), have the potential to improve communications and planning both within the park and between the park and the community it serves. My comments and suggestions follow:

1- The plan is severely weakened because it does not prioritize the goals. Since the resources specified to complete this plan are greater than the park has ever or is likely to ever receive, the lack of prioritization is critical to evaluating the plan's merit. Different anticipated resource levels will significantly effect what tasks should be funded. For example, observe how in Proposal C, the ships represent 54% of the budget, but in Proposal A, 36% and Proposal B, 34%.

The recently released, unsigned, Resource Management Plan 1996 (RMP) provides a possible prioritization. However, it does not address what criteria is used to prioritize the projects listed and is uneven in the level of detail specified. Further, as a prioritization of the GMP, it does not accurately reflect any of the three alternatives in the GMP. Some other issues to note with the RMP are that out of 134 line items in this document, only 17 have any funding in 1996. Routine maintenance is the greatest challenge to the park and represents 40% of the RMP budget, but it is represented by a single line item in the RMP. Even with its problems, I strongly suggest that anyone trying to grasp the enormity of the challenges facing this park acquire and read this document.

2- Almost no information supporting the cost estimates in the GMP is provided. For example, the Haselett warehouse plan shows less park and more commercial use than the long published plan for this building and this is not explained. In each

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RESPONSES

1. Implementation of proposed actions would require logical phasing for the many improvements and resource preservation actions called for in the General Management Plan. The prioritization, general timing, and cost estimates of implementation of proposed actions are shown in appendix B. More detailed phasing of actions and costs would be developed through implementation plans and other more specific management plans such as the resource management plan and the historic vessel preservation plan. The latter plan would provide the park direction using a more specific, systematic, and prioritized method for meeting the fleet's preservation and maintenance needs. The specific management decisions regarding personnel, contracts, and day-to-day operations are details beyond the scope of the general management plan.

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2. See response regarding the *Wapama* to the October 18 letter from the advisory commission.

proposal the ships are represented in a single line item with no explanation as to how it would be spent.

3- No time scale is provided for any of the goals. In many cases this materially effects the plans merit and plausibility.

4- The plan does not address how the resources the park does receive will be better utilized in the future. Current management has been remarkably successful in acquiring financial resources for the park (and for this should be commended); however, it has a poor record in achieving results with those resources. The greatest weaknesses in this park are its management of human resources, management of major contracts and management of day to day operations. Within the many constraints created by the NP's structure that exist today, improvement is possible in each of these areas. The park's master plan must attempt to address these needs.

5- When a large or long term project is recommended interim measures need to be analyzed to maintain planning continuity. Often, the cost and quality tradeoffs of interim measures will materially effect long term goals.

6- The lack of prioritization, resource evaluation, time scales and resource utilization effectiveness will make it very difficult to measure and reward success or failure in implementing the plan.

Some specifics:

7- The plan gives no indication as to whether the park anticipates disassembly of *Wapama* next year or in ten years. Actual disassembly is a multi-million dollar expense that is likely to be deferred until *Wapama* is a immanent threat to safety. Estimates of how long this can be deferred are needed. For example what would spending approximately 100K per year for 1 FTE, accrual for major expense, borate treatment, some kind of tenting, safety items, volunteers, etc. do for the ship? Would it be enough to slow her degradation to an unsafe level for 10 years? Deferral of a multi-million dollar expense would free up resources for the other ships and the warehouse. It also leaves open the possibility of outside efforts to save major components of the vessel.

8- While the park keeps Eppelton Hall, nothing is specified about spending approximately 100K per year for 1 FTE, accrual for dry-dock, stabilization and restoration expenses. It has been suggested that at this low level of support she might not only be stabilized, but should make slow progress towards steaming.

9- The C.A. Thayer section does not provide any guidance as to how the goals specified will be achieved. Further the lack of time scale is very significant here as the lead times on acquiring materials and funding for a rebuild are long. Planning is needed so that appropriate interim measures can be funded to maintain the safety of the vessel and its visitors. It is likely that some time in the near future, well

COMMENTS

RESPONSES

- before rebuild resources are available, that tenting, mast removal, and other significant steps will be required. They can and should be anticipated in the plan.
- 10- Although day to day maintenance is mentioned, it has been the greatest single failure of this park since before it became a national park. This document should have greater emphasis on cleaning, coating, caulking, canvassing, etc.
- 11- It would be beneficial to see a graph showing the proportion of park resources spent on administrative, supervisory, tradesmen, etc. for each division. Particularly how these proportions have varied over the past few years and what is planned for the future.
- 12- If and when Haselett warehouse is renovated and becomes the primary exhibit space, what happens to the bathhouse? The cost estimates for stabilization and minimal restoration of the bath house in the RMF now run into the millions of dollars. The building presents challenges for use as a visitor center, display space, conference/rental facility, or bath house. What vision the park has for this building's future will significantly effect the merit of many other aspects of the plan.
- 13- Removing crews from the ships has significant tradeoffs. Most historic ships worldwide retain work areas on the ships for many reasons. On the ship there is more pride of ownership, visibility/accessibility of unique craft work to the public, efficiency of operation and it is harder to miss/ignore problems. Off the ship the advantages can be greater safety, and larger visitor access. Compromises that I would suggest for Balclutha include removing changing areas to a common facility with other ships division crews and partially opening up access to one side of the hold to visitors. Moving rigging workspace to the fish processing center is a good second best, but will not maintain any of the benefits of them working on the ship. I also worry about whether this facility is likely to be made available given the increased investment in the fish industry being made by the port.
- 14- Opening the tunnel for pedestrian traffic, and possibly seasonal rides in a "cargo" trailer would be very attractive independent of more ambitious possible rail use. Connecting Aquatic Park and Fort Mason Center together would have tremendous benefits for the entire waterfront. Combined with Haselett, the bath house and the pier we can begin to see a vision for a very inviting north anchor to the visitor district. This can be done low cost without incorporating rail projects, i.e. better lighting, gates for night, etc.
- 15- Future drawings should include the port plans for the rest of the port's plans for Hyde street, the fuel pier, etc.
- I hope these comments can be used to help improve the park that we all support. My perspective on the park has developed from thousands of hours of volunteer work at the park, as well as having provided financial support. My past experience in historic vessels runs back more than ten years. I know of no institution

3. The short and long-term proposals for the Aquatic Park Bathhouse are included in the Aquatic Park/Victorian Park Development Concept Plan.
4. The document has been revised to indicate that the park would support opening the railroad tunnel under Fort Mason and extending the F-line rail system from Fisherman's Warf west through Aquatic Park to the Presidio. See response 20 to the Port of San Francisco.

COMMENTS

worldwide that has more truly significant ships and certainly none with the amount of historic fabric that is in this park. Very few have as large a budget or staff to work with. I hope this planning process will help the park to move forward so it may some day be deserving of recognition as a model of historic ship preservation and interpretation.

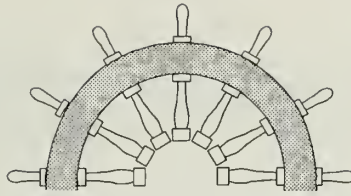
Yours truly,



Richard Pikelney

RESPONSES

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APPENDIX D

**LETTER OF AGREEMENT FOR CONSISTENCY DETERMINATION
SAN FRANCISCO BAY CONSERVATION AND DEVELOPMENT COMMISSION**

SAN FRANCISCO BAY CONSERVATION AND DEVELOPMENT COMMISSION

THIRTY VAN NESS AVENUE, SUITE 2011
SAN FRANCISCO, CALIFORNIA 94102-6080
PHONE: (415) 557-3686

**LETTER OF AGREEMENT FOR CONSISTENCY
DETERMINATION NO. CN 4-96**

November 26, 1996

William Thomas, Superintendent
San Francisco National Maritime Historic Park
United States Department of the Interior
National Park Service
Building E, Fort Mason
San Francisco, California 94123

Received SAFR

Superintendent's Office

Ladies and Gentlemen:

On November 21, 1996, the San Francisco Bay Conservation and Development Commission, by a vote of 16 affirmative, 0 negative and 0 abstentions, adopted the following resolution:

I. Agreement

A. The San Francisco Bay Conservation and Development Commission agrees with the Department of the Interior, National Park Service, San Francisco Maritime National Historic Park, that the following elements of the Draft General Management Plan (DGMP) are generally consistent with the Commission's amended coastal zone management plan for San Francisco Bay:

1. **Historic Vessel Management.** The preferred alternative for the park management plan provides for the continued preservation and berthing of the historic ships *Alma*, *Balclutha*, *Eureka*, *Hercules*, *C.A. Thayer*, and *Eppleton Hall*. The steam schooner *Wapama* which is now located on a barge, will be retained on the barge as an interpretive display vessel and transferred to an alternative Bay Area site such as Pier 32, Treasure Island, or Mare Island. Due to continued deterioration, the *Wapama* may eventually be dismantled and parts of the vessel retained for interpretive and research purposes. The Lewis Ark houseboat will be preserved as an exhibit adjacent to the pier.
2. **Hyde Street Pier and Forepier Development/Hyde and Jefferson Streets.** The Hyde Street Pier will remain as the primary interpretive display location for the historic ships. Views to the pier will be improved by removing non-essential structures. The forepier will be redesigned in a 19th century nautical theme using paving treatments, improved signs and theme lighting to increase visual interest and additional space will be provided for visitor circulation and interpretive activities. Views to the pier will be improved by removing visual obstructions. The existing fee collection/entrance station will be relocated to the far end of the forepier. The existing small craft shop on the pier will be replaced with an improved structure designed to complement the pier theme and to minimize view obstructions. The main pier will be redesigned to improve visitor access to the *Eppleton Hall* and Lewis Ark.

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3. **Haslett Warehouse Development.** The DGMP states that the long term goal of the Park Service is to renovate the existing Haslett Warehouse, an historic structure, in order to house park headquarters and to function as a prime exhibit facility. As the structure is an unreinforced brick building, the cost of renovation is estimated to be \$18 to 19 million. In order to accomplish this goal in a shorter time frame, the DGMP provides for a partnership agreement with a private developer that will be responsible for rehabilitating the building for a combination of Park Service and as yet unspecified commercial lease uses. Initially, the Park Service will occupy a portion of the first and second floors of the building for museum exhibits, visitor contact, and some storage. Remaining building space will be used for commercial leases, with a portion of the revenue returned to the Park for historic preservation and other purposes. The partnership agreement will provide for incremental increases in building space for the Park in relation to the developer's operating costs, debt service and return on investment.
4. **Aquatic Park/Victorian Park Development.** The Aquatic Park Bathhouse will continue to be used as the Park's primary exhibit facility until space is obtained in the Haslett Warehouse for museum relocation, and necessary improvements and maintenance will occur until the exhibits are moved. The San Francisco Senior Center will remain in its current locations in the west basement and east wing areas of the Bathhouse. When the maritime museum is relocated into the Haslett Warehouse, the Bathhouse will be made available to the public by allowing the main floor, veranda, west wing and second floor to be opened for general viewing by the public. It will also be used for receptions, meetings and conferences, and will be managed by the nonprofit National Maritime Museum Association. In addition, the West Roundhouse will potentially be returned to its historic uses as a snack/concession stand and restrooms. The open space areas will continue to be maintained and enhanced for public use through landscaping, benches, signs and other design features that will complement the 19th century design theme of Victorian Park and the streamlined modern style of the Aquatic Park area. The existing bocce ball courts will be maintained and a new children's play area added adjacent to the courts. The maritime bookstore now located on Hyde Street will be relocated to the southwest corner of Hyde and Jefferson Streets in Victorian Park as part of a small public plaza designed to integrate Victorian Park with the Hyde Street Pier and Haslett Warehouse. This area is now used for maintenance vehicle parking and landscaping. The existing Sea Scout base will be rehabilitated for continued use by the Sea Scouts and the Park will explore options with other organizations to provide sail training and to rehabilitate and maintain the existing building.
5. **Hyde and Jefferson Street Intersection.** The primary entrance into the park will be centered around the intersection of Hyde and Jefferson Streets, which will be designed to function as an informal pedestrian plaza through the use of 19th century San Francisco design elements and careful placement of park signs. The design theme will be compatible with the architectural style of Hyde Street Pier, Haslett Warehouse and Victorian Park and will be reflected in design guidelines for such elements as benches, light fixtures, railings, pier decking, street paving, signs, banners and new or replacement structures.

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The Park Service proposes to enhance pedestrian access into the park by restricting vehicular traffic and parking during peak visitation hours on weekends and during the peak visitor season. This would allow the intersection to function as a pedestrian-oriented plaza. This would be accomplished, in concert with the City and County of San Francisco, by deflecting vehicular traffic out of the Fisherman's Wharf area onto Leavenworth Street at the Cannery instead of on Hyde Street.

B. This agreement is given based on the information submitted by or on behalf of the Department of the Interior, National Park Service, San Francisco Maritime National Historic Park, in its Draft General Management Plan/Environmental Impact Statement dated June 1996, and in its letter providing supplemental information dated November 14, 1996.

II. Findings and Declarations

A. **Project Description.** On July 29, 1996, the U.S. Department of the Interior, National Park Service, submitted the Draft General Management Plan/Environmental Impact Statement for the San Francisco Maritime National Historic Park and requested that the Commission concur on a conceptual basis that the proposed plan is consistent with its Amended Coastal Zone Management Program for San Francisco Bay. The DGMP provides a long-term vision for the continued use and maintenance of the San Francisco Maritime National Historic Park, which includes the Hyde Street Pier and its historic ship collection, a forepier/entry that includes the museum bookstore, Victorian Park, Aquatic Park including upland open space areas and an open water area, known as the lagoon, the Aquatic Park Bathhouse, and the Sea Scout base, all located on the northern waterfront adjacent to lower Fort Mason, in the City and County of San Francisco.

Existing uses of the Aquatic Park Lagoon include active and passive recreational uses, particularly boating and sailing adjacent to the existing Sea Scout base and swimming and rowing sports, principally by members of the two existing swimming and rowing clubs located adjacent to the Hyde Street Pier.

The preferred alternative of the DGMP would generally provide for the continued use, maintenance and improvement of Park facilities. This includes the use of the onshore open space areas for park purposes and of the open water areas for fishing, swimming and rowing and for sail training. The DGMP also provides for the rehabilitation of the existing Sea Scout base and the potential for its use by community organizations for sail training.

B. **Jurisdiction.** A state does not have permit authority over federal activities that will occur within the state unless the federal government has waived its sovereign immunity. However, the federal Coastal Zone Management Act requires a federal agency conducting an activity that would affect the coastal zone to conduct the activity in a manner that is consistent to the maximum extent practicable with the federally-approved coastal zone management program. The CZMA and its implementing regulations establish a process for meeting this requirement by requiring the federal agency to submit a "consistency determination" to the appropriate state coastal zone management agency. Thereafter, the state coastal zone management agency reviews and either agrees with or objects to the consistency determination. If the state coastal zone management agency objects to the consistency determination, the federal agency may nevertheless proceed with the federal activity.

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If the federal agency proceeds with a project over the objection of a state coastal zone management agency, the agency's only recourse is to file suit against the federal agency. However, a mediation process that involves the Secretary of Commerce is available to try to mediate differences prior to filing a lawsuit.

The Commission has adopted a Management Program for the San Francisco Bay segment of the California Coastal Zone and the federal government has certified the Commission's program. Under the program, the Commission processes a consistency determination as much like a permit as possible. However, certain differences do exist between the processing of a consistency determination and of a permit under state law.

The Commission has previously taken the position that a nonfederal activity that requires a federal permit and that is inconsistent with a priority use designation in the *San Francisco Bay Plan* would affect the coastal zone, which is coextensive with the Commission's permit jurisdiction, and would therefore require consistency review and provide the basis for an objection to the consistency determination. The California Court of Appeal has upheld this position.

Here, the entire San Francisco Maritime National Historic Park is located within a *San Francisco Bay Plan* park priority use area as designated in the *San Francisco Bay Plan*. Therefore, the National Park Service submitted a consistency determination for the DGMP. In reviewing the consistency determination, the Commission must consider all of the enforceable policies of the McAteer-Petris Act and the *San Francisco Bay Plan*, particularly those policies that relate to public access, recreation, fill, and water quality, but only those policies.

The consistency determination now under review is for a general, long-range plan. The Commission must base its decision on whether to agree or object to the consistency determination on whether or not the general concepts outlined in the DGMP are consistent with the Commission's enforceable policies as contained in the McAteer-Petris Act, the *San Francisco Bay Plan*, and the Commission's regulations. The Commission also finds that any individual projects proposed in the DGMP will require the submittal of a specific consistency determination for the individual project and Commission agreement with the project.

The Commission also notes that two existing swimming and rowing clubs, the Dolphin Club and the South End Rowing Club, are surrounded by the Park. However, the property on which these two clubs are located is owned by the City and County of San Francisco, administered by the Department of Recreation and Parks, and leased to the two clubs. Therefore, these two areas are subject to the Commission's permit authority under the McAteer-Petris Act, and projects proposed on the clubs' properties would require a permit from both the appropriate agency of the City and County of San Francisco and from the Commission.

C. Bay Plan Policies. As noted above, the San Francisco Maritime National Historic Park is located within a Bay Plan-designated park priority use area. Therefore, the Bay Plan policies relating to park priority uses and public access apply. These policies call for the maintenance of designated park areas for public access and Bay-oriented recreation. In addition, the consistency determination raises other fundamental issues as discussed more specifically below:

1. **Recreation.** As stated above, the Bay Plan policies on recreation call for the maintenance of designated park priority use areas for public access and Bay-oriented recreation. The DGMP includes the preservation of Park areas for existing recreational

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uses. The Commission notes that, based on public concerns raised at the public hearing on the consistency determination, the existing use of the Aquatic Park Lagoon includes a limited amount of boating and swimming, which is an historic and important Bay-oriented recreational use on the San Francisco waterfront that should be protected and preserved. The National Park Service has submitted a letter, dated November 14, 1996, which re-states the Park Service's commitment to the preservation of swimming in the lagoon.

In addition, the Bay Plan policies on Recreation state, in part, that: "Limited commercial recreation facilities, such as small restaurants, should be permitted within waterfront parks provided they are clearly incidental to the park use, are in keeping with the basic character of the park, and do not obstruct public access to and enjoyment of the Bay. Limited commercial development may be appropriate (at the option of the park agency responsible) in all parks shown on the Plan maps except where there is a specific note to the contrary." The DGMP states that the long term goal of the Park Service is to renovate the existing Haslett Warehouse, an historic structure, in order to house park headquarters and to function as a prime exhibit facility. In order to accomplish this capital-intensive project in a shorter time frame, the DGMP provides for a partnership agreement with a private developer that would be responsible for rehabilitating the building for a combination of Park Service and as yet unspecified commercial lease uses.

The Haslett Warehouse is a significant historic structure on the San Francisco waterfront and an important element of the Park, thus the reinforcement of the building prior to a major seismic event in the Bay Area is critical. As a general concept, the DGMP's proposal to pay for the renovation of the building through engaging a private developer and allowing commercial uses in a portion of the building appears to be appropriate and generally in keeping with the Bay Plan requirements pertaining to limited commercial uses in designated park priority use areas, so long as the commercial uses can be defined as limited, are clearly incidental to the park use and are in keeping with the character of the park. The Commission notes that general office uses do not meet this definition, unless such use is very limited and clearly needed to support approvable uses within the Park. The final determination of whether the Commission could concur that a plan to use a portion of the building for limited commercial uses is consistent with the Bay Plan requirements, however, would depend upon the details of such a proposal. The Commission finds, therefore, that DGMP's proposal to lease a portion of the Haslett Warehouse is conceptually consistent with its amended management program for San Francisco Bay. However, any specific plan to implement this proposal will require subsequent consistency review by the Commission.

2. **Public Access.** The Bay Plan policies on public access state, in part, that; "Access to the waterfront should be provided by walkways, trails, or other appropriate means and connect to the nearest public thoroughfare where convenient parking or public transportation may be available...." The DGMP provides for the long term maintenance of public access facilities located in the Park, including the open space areas of Aquatic and Victorian Parks. In addition, the primary entrance into the park would be centered around the intersection of Hyde and Jefferson Streets and would be designed to function as an informal pedestrian plaza through the use of 19th century San Francisco

design elements and careful placement of park signs. Additionally, the plan proposes to explore enhancing pedestrian access into the park by restricting vehicular traffic and parking during peak visitation hours on weekends and during the peak visitor season. This would allow the intersection to function as a pedestrian-oriented plaza. This would be accomplished, in concert with the City and County of San Francisco, by deflecting vehicular traffic out of the Fisherman's Wharf area onto Leavenworth Street at the Cannery instead of on Hyde Street. It should also be noted that only portions of this area are within the Park boundaries, thus additional permits would be required from the City and County of San Francisco before such a proposal could be implemented.

As a general concept, this proposal could greatly enhance public access to and along the waterfront. Thus, this proposal appears to be consistent with the Bay Plan policies on public access. However, it should be noted that existing public access and recreational users of the Aquatic Park Lagoon include both the elderly and those with small boats such as kayaks and canoes. It is important, therefore, that these recreational users of the Bay be accommodated in any plan to limit vehicular access to the shoreline in this area. The Commission, therefore, finds that as a general concept the DGMP is consistent with the Bay Plan policies on public access, but that any specific proposal to implement this proposal will likely require a permit, a consistency determination, or both, depending on the location of the affected area.

3. **Fill.** The McAteer-Petris Act states, in part, that Bay fill, including structures placed in, over, or under the waters of San Francisco Bay, must be for a water-oriented use or for minor fill to improve shoreline appearance and public access, must be the minimum amount necessary, and there be no alternative upland location for the fill. The DGMP does not appear to propose any new fill in the Bay. However, it does propose the rehabilitation of the Sea Scout base, which may include new fill in the form of new pilings and docks. The Commission believes in concept that fill for the rehabilitation of the existing Sea Scout base would be for a water-oriented use. However, at such time that a detailed proposal for the rehabilitation of the Sea Scout base, or any other proposal involving Bay fill, is proposed, a new consistency review will be required to determine whether the proposed fill would be consistent with all of the fill policies of the McAteer-Petri Act and San Francisco Bay Plan.
4. **Water Quality.** The Bay Plan policies on water quality state, in part, that "Water quality in all parts of the Bay should be maintained at a level that will support and promote beneficial uses of the bay...." The only project proposed in the DGMP that could have an adverse impact on water quality appears to involve the rehabilitation of the existing Sea Scout base. However, as stated in the DGMP, the National Park Service would need to comply with existing standards for water quality under Sections 401 and 404 of the Clean Water Act and would implement measures to prevent impacts on water quality from construction and operation of the base. The Commission finds, therefore, that the DGMP is generally consistent with the Bay Plan policies on water quality, but that individual projects contained within the DGMP will require individual consistency determinations at which time water quality issues will be specifically addressed.
5. **Historic Ships/Wapama.** The Commission's management program for the Bay does not contain any enforceable policies regarding the preservation and renovation of historic ships. The Commission recognizes, however, that the steam schooner *Wapama*

is an important historic maritime treasure for the people of the entire region and nation and her dismantling would be a significant loss to the national maritime tradition. Further, if the resources could be found to restore the *Wapama*, her return to the San Francisco Maritime National Historic Park would be invaluable to the Park and the San Francisco waterfront. Therefore, the Commission encourages the National Park Service to explore every last option at its disposal to protect and restore the *Wapama* prior to dismantling as proposed in the DGMP.

D. Information Requirements. As stated previously, the DGMP is a conceptual document intended to provide a generalized plan to guide the future use, maintenance and improvement of the San Francisco Maritime National Historic Park. As such, the Commission finds that there is enough information in the document to conclude that this conceptual plan is generally consistent with its amended management program for San Francisco Bay. However, the Commission does not at present have enough specific information on any individual project or action envisioned in this document to concur with its implementation. Therefore, the Commission also finds that any specific proposal to implement the projects or actions included in this plan, or any other project at the Park, will likely require further consistency review to ascertain whether the proposal is consistent with the Bay Plan, including the policies on public access, recreation, fill, and water quality. Further, as there are a number of potentially conflicting uses in the area, including swimming, rowing, fishing, boating, tourism, other forms of passive and active recreation, museum, parking and transportation, the Commission may be in a position to play an active role in resolving potentially conflicting recreational uses at this very unique stretch of the Bay shoreline.

E. Environmental Impact. Based on the Draft General Management Plan/Environmental Impact Statement, it does not appear that implementation of the DGMP would have a significant adverse impact on Bay resources or on the environment. However, as stated previously, the potential adverse effect of any particular project cannot be fully assessed without a detailed proposal. Thus, these future projects will likely require further consistency review by or on behalf of the Commission.

F. Coastal Zone Management Act. The Commission, pursuant to the Coastal Zone Management Act of 1972, as amended (16 USC Section 1451), and the implementing Federal Regulations in 15 CFR Part 930, is required to review federal projects within San Francisco Bay and agree or disagree with the federal agency's determination that the project is consistent with the Commission's Amended Coastal Zone Management Program for San Francisco Bay. This letter constitutes such review and comment on a conceptual basis only.

G. Conclusion. For all of the above reasons, the Commission finds that the preferred alternative of the Draft General Management Plan for the San Francisco Maritime National Historic Park is generally consistent to the maximum practicable extent with its amended management program for San Francisco Bay.

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Executed at San Francisco, California, on behalf of the San Francisco Bay Conservation and Development Commission on the date first above written.

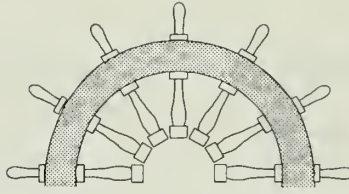
WILL TRAVIS
Executive Director
San Francisco Bay Conservation and
Development Commission

By: 

STEVE GOLDBECK
Coastal Program Manager

SG/RLC/vm

cc: U. S. Army Corps of Engineers, Attn: Regulatory Functions Branch
San Francisco Bay Regional Water Quality Control Board,
Attn.: Certification Section
Environmental Protection Agency, Attn: Mike Monroe, W-3-3
Marin County Planning Department
Hank Bruce Architects



APPENDIX E

**PROGRAMMATIC AGREEMENT
SAN FRANCISCO MARITIME NATIONAL HISTORICAL PARK,
CALIFORNIA STATE HISTORIC PRESERVATION OFFICER, AND
ADVISORY COUNCIL ON HISTORIC PRESERVATION**

Advisory Council On Historic Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

Reply to: 12136 West Bayaud Avenue, #330
Lakewood, Colorado 80226

May 2, 1997

Received SAFR

William Thomas, Superintendent
San Francisco Maritime National Historic Park
Bldg. E, Lower Fort Mason, Room 265
San Francisco, CA 94123

Superintendent's Office

RE: *Programmatic Agreement regarding the General Management Plans, San Francisco
Maritime National Historic Park, CA*

Dear Mr. Thomas:

The enclosed Programmatic Agreement (PA) regarding the implementation of the General Management Plan for San Francisco Maritime National Historic Park has been executed by the Council. This action constitutes the comments of the Council required by Section 106 of the National Historic Preservation Act and the Council's regulations. Please obtain the signature of the SAFR Advisory Commission, send the original PA to this office and copies of the Agreement to the California State Historic Preservation Officer and your Federal Preservation Officer.

The Council appreciates your cooperation in reaching a satisfactory resolution of this matter.

Sincerely,



Lee Keatinge
Historic Preservation Specialist
Western Office of Planning and Review

Enclosure

PROGRAMMATIC AGREEMENT AMONG THE NATIONAL PARK SERVICE, SAN FRANCISCO MARITIME NATIONAL HISTORICAL PARK (SAFR), THE CALIFORNIA STATE HISTORIC PRESERVATION OFFICER (SHPO), AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION (COUNCIL) REGARDING THE GENERAL MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT, SAN FRANCISCO MARITIME NATIONAL HISTORICAL PARK, CALIFORNIA.

WHEREAS, NPS proposes to adopt and implement Alternative A (Undertaking) of the June 1996 Draft General Management Plan (GMP) for SAFR, which will provide direction for appropriate levels of public use, adaptive use of historic buildings, treatment and management of cultural and natural resources within the park; and,

WHEREAS, the NPS has determined that the Undertaking may have an effect on properties included in or eligible for inclusion in the National Register of Historic Places and/or designated National Historic Landmarks (Aquatic Park Historic District, Tubbs Building and Haslett Warehouse ALMA, BALCLUTHA, C.A. THAYER, EUREKA, HERCULES, JEREMIAH O'BRIEN, WAPAMA, LEWIS ARK), and has consulted with the California State Historic Preservation Officer (SHPO) and Advisory Council on Historic Preservation (Council) pursuant to Section 800.13 of the regulations (36 CFR Part 800), implementing Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470; hereinafter NHPA) and pursuant to Section 110 of the NHPA; and

WHEREAS, the SAFR Advisory Commission established by Public Law 100-348 (June 27, 1988) has participated in development of the GMP and has been invited to concur in this agreement; and

WHEREAS, the NPS provided the public and local, state and federal agencies the opportunity to participate in the development of the plan and comment on the draft GMP/EIS; and

WHEREAS, the NPS has established Management Policies, Cultural Resource Management Guidelines (NPS-28), and conducts its undertakings according to the standards and guidelines established by the Secretary of the Interior for the treatment and management of historic properties consistent with the spirit, intent, and legal requirements of the NHPA; and

WHEREAS, The NPS has a qualified staff of cultural resource specialists who meet, or are under the direct supervision of a person or persons who meet, at a minimum, the appropriate qualifications set forth in the Department of the Interior's "Professional Qualifications Standards" (36 CFR Part 61) and utilizes licensed navel architects and marine engineers to plan treatment for cultural resource management; and

NOW, THEREFORE, the NPS, SHPO, and Council agree that should the NPS proceed with the Undertaking, the NPS will ensure that the following stipulations are implemented to satisfy the NPS's Sections 106 and 110 responsibilities for all individual actions related to the Undertaking:

STIPULATIONS

The NPS shall ensure that the following measures are carried out:

I. APPLICABILITY OF AGREEMENT

- A. This Agreement applies to all individual actions described in Alternative A of the June 1996 Draft General Management Plan/Environmental Impact Statement, San Francisco Maritime National Historical Park, California.
- B. The Draft GMP/EIS was on public review for sixty days. If, the public review process causes modifications that result in additional adverse effects, NPS will convene the agreeing parties to review the terms to determine whether this agreement can be or will be amended or a new compliance action be pursued.
- C. Minor changes in design, procedures or materials will be allowed under this agreement provided such changes are consistent with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings or The Secretary of the Interior's Standards for Historic Vessel Preservation Projects with Guidelines for Applying the Standards. Minor changes will be documented and included in the annual report provided for in Stipulation XIV, below.

II. REVIEW OF ACTIONS

A. Review Criteria

The actions described in Alternative A of the June 1996 Draft General Management Plan/Environmental Impact Statement, San Francisco, California will be reviewed and documented for purposes of this agreement within the NPS without further review by the Council or SHPO, provided that:

1. SAFR has completed and reviewed project proposals that provide adequate information to identify and evaluate the potential effects of proposed action on a historic property or properties; and
2. the NPS finds the proposed action does not adversely affect historic properties based on the criteria found in 36 C.F.R. 800.9; and
3. the NPS ensures that the actions are carried out in compliance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings and The Secretary of the Interior's Standards for Historic Vessel Preservation Projects with Guidelines for Applying the Standards, as appropriate; and,
4. the actions are documented and a record included in the annual report pursuant to Stipulation XIV, below; and
5. NPS archeologists monitor all proposed undertakings involving ground-disturbing activities.

B. Failure to Meet Criteria

All proposed actions which do not meet the criteria established in Stipulation II (A), above, will be treated as separate compliance actions in accordance with 36 CFR 800: Protection of Historic Properties.

III. WAPAMA

Alternative A proposes that minimal measures to slow down deterioration of the steam schooner WAPAMA, a property listed in the National Register of Historic Places and a designated National Historic Landmark, be implemented, but that the vessel's underlying structural decay would not be addressed. The ship would be dismantled when it could no longer be maintained in a safe condition.

Dismantling would be taken only as a last resort. Prior to implementation, the NPS, in full consultation with the SHPO, shall explore the widest possible range of alternative measures for preserving the vessel. Such alternatives shall include, in priority order, leasing of the vessel, working with local/state/federal government or private agencies to relocate the vessel to a site conducive to preservation and interpretation, or transfer to a federal or state or private entity with the proven capability of funding and carrying out the preservation of the vessel.

A. Marketing

1. The NPS will develop a marketing plan for leasing and/or transfer of the vessel that shall include the following:
 - a. an information package about the ship, including, but not limited to:
 1. photographs
 2. information on ship's historic significance
 3. information on the cost of rehabilitating/maintaining the vessel
 4. notification that the recipient will be required to maintain the vessel in accordance with the recommended approaches in The Secretary of the Interior's Standards for Historic Vessel Preservation Projects with Guidelines for Applying the Standards
 5. notification of the requirement for inclusion of a protective condition in transfer instrument
 6. eligibility for 20% rehabilitation tax credit
 - b. a distribution list of potential recipients

c. a schedule for receiving and reviewing offers

2. NPS shall provide SHPO the opportunity to review and comment on the marketing plan and on terms of any leasing, relocation, or transfer. NPS shall consider all comments and modify its proposed action accordingly. If modification is not feasible, NPS will consult further with SHPO and Council to address any outstanding issues.

B. Dismantling

Should leasing, relocation, or transfer of the vessel prove impossible within two years from the date of completion of the general management plan, or should transfer prove impossible or should structural collapse be imminent and the vessel become a safety hazard, NPS shall implement demolition. NPS shall provide the SHPO the opportunity to comment on the decision to demolish the vessel. Should the SHPO disagree, NPS shall consult according to Stipulation IX, Dispute Resolution.

Prior to Dismantling, the NPS shall:

1. consult with SHPO to determine what level and kind of recordation is required for the property. NPS shall ensure that unless otherwise agreed to by Historic American Building Survey (HABS) or Historic American Engineering Record (HAER), as appropriate, all documentation is completed and accepted by HABS or HAER prior to dismantling. NPS shall ensure that copies of this documentation will be deposited in the Library of Congress, San Francisco National Historical Park library and archives, and with the SHPO.
2. conduct a survey of the vessel and select any hardware or other material that might be used in preserving other vessels in the park, curated, or utilized for interpretive purposes.

C. Report

NPS shall prepare for public distribution a report that details the administrative history of the WAPAMA, maintenance history and reasons for dismantling.

D. Interpretation

NPS shall ensure that the story of the WAPAMA, including reasons for dismantling, remains a part of SAFR interpretive activities. Salvaged elements may be used to interpret the history of the WAPAMA and steam schooners to the maximum extent possible.

IV. REQUIRED CONSULTATION

- A.** SAFR shall consult pursuant to 36 CFR 800 on all proposals having an adverse affect based on criteria found in 36 CFR 800.9.
- B.** If a previously unidentified resource that may be eligible for inclusion in the National Register is discovered during the course of a project, NPS will cause the contractor to stop work in the vicinity of the discovery and will take all reasonable measures to avoid or minimize harm to the property. If the newly discovered property has not previously been included in or determined eligible for the National Register, NPS may assume that the property is eligible for purposes of this agreement. NPS will notify the SHPO within one working day of discovery. This notification may be made by phone, and will be documented in park records. The SHPO will respond within one working day, and if SHPO does not respond, NPS will resume activities. If the NPS and SHPO disagree, NPS will consult according to Stipulation IX, Dispute Resolution.

V. NATURAL DISASTERS

The park has experienced major fires, earthquakes, wind damage from storms, earth slides, and other natural disasters/emergencies which are likely to recur in the future. In the past, and it is quite likely that, in

the future, communication may not be possible for lengthy periods of time. During such a time, the NPS would not be able to contact the SHPO regarding efforts to protect historic properties. The park shall undertake emergency actions pursuant to the terms of this agreement to stabilize historic properties and prevent further damage without SHPO consultation utilizing park historic preservation and/or licensed navel architectural or marine engineering expertise. All such emergency measures would be undertaken in accordance with the Secretary of the Interior's standards and in a manner that does not foreclose future preservation or rehabilitation. When telephone communications are reestablished, the NPS will consult with SHPO and, within 30 days after initiating emergency repairs, the NPS will document the action and provide a copy of the documentation with illustrations to the SHPO and Federal Preservation Officer, NPS. Permanent repairs to historic properties are not authorized by this stipulation.

VI. EMERGENCY REPAIRS

- A. SAFR shall undertake emergency repairs to the subsurface infrastructure with on-site monitoring by a NPS archeologist. Emergency repairs to historic buildings will be under the direction of a historic architect and historic ships under direction of the SAFR Historic Preservation Officer. Repairs by the Park will be documented with an additional statement of fact on the circumstances, signed by the superintendent and the historic preservation person accomplishing the monitoring.**
- B. Should unknown historic properties be discovered during emergency repair activity, work in the immediate area of the discovery will cease unless work cessation will not impede emergency repairs. If the superintendent determines that work cessation at the discovery site will impede emergency repairs, emergency repair will continue and park officials shall notify the**

SHPO by telephone as soon as reasonably possible and provide the following information:

1. finding of an emergency
 2. description the emergency and steps necessary to address the situation
 3. description of the discovery and its apparent significance
 4. description of the emergency work and potential effect on the discovery feature
 5. efforts to address historic properties according to the Secretary's Standards
- C. The park shall reach concurrence with the SHPO on the eligibility, treatment of the resource and document the consultation and treatment accomplished. The NPS shall address actions to minimize effects, present status and condition of the discovered feature, recommendations for subsequent evaluation and treatment of the feature.
- D. The NPS shall provide SHPO with a report summarizing results of treatment to the eligible property during emergency repairs.

VII. PERMITS

- A. Permits and other legal agreements (including, but not limited to, historic property leasing, short term use permits, special necessary permits, leases, concessions, contracts, and easements) for use of lands and structures in San Francisco Maritime National Historical Park will reflect a diversity of uses. All such agreements shall contain terms and conditions that the NPS deems necessary to protect and preserve historic properties. NPS shall attempt to include such terms and conditions in permits that it seeks from other agencies.

- B. The NPS shall ensure that permits provide for identification and treatment of historic properties in such a manner that meets appropriate guidelines and standards, require archeological clearances for any ground-disturbing activity, and require advance project review and approval on the same basis as required of proposed undertakings. The NPS will ensure that the permit language provides for permanent cancellation should any project be undertaken without compliance with Sections 106 and 110 NHPA.**

VIII. RELATIONSHIP TO PLANS

Separate Section 106 compliance shall be undertaken for all major new planning efforts (including development concept plans and comprehensive plans) and projects will be in accordance with the nation-wide the National Conference of State Historic Preservation Officers.

IX. DISPUTE RESOLUTION

- A. Should the SHPO or Council object within 30 days to any matter submitted by the NPS for review pursuant to this agreement, the NPS shall consult with the objecting party to address the objection. If the NPS or the objecting party determines that the objection cannot be resolved, the NPS shall forward all documentation relevant to the dispute to the Council. Within 30 days after receipt of all pertinent documentation, the Council will either:**
- 1. provide the NPS with recommendations, which the NPS will take into account in reaching a final decision regarding the dispute; or**
 - 2. notify the NPS that it will comment pursuant to 36 CFR Part 800.6(b), and proceed to comment. Any Council comment provided in response to such a request will be taken into account by the NPS in accordance with 36 CFR**

Part 800.6(c)(2) with reference only to the subject of the dispute; the NPS's responsibility to carry out all actions under this agreement, that are not the subjects of the dispute, will remain unchanged.

- B. Should a member of the public raise an objection to the manner in which a measure stipulated in this agreement is implemented, the NPS shall take the objection into account and consult with the objecting party for 30 calendar days. If NPS determines that the objection cannot be resolved, NPS shall submit the objection, pertinent documentation and recommended resolution pursuant to Section A of this stipulation.

X. AMENDMENTS

Any party to this agreement may request that it be amended, whereupon the parties will consult in accordance with 36 CFR 800.13.

XI. FAILURE TO CARRY OUT AGREEMENT

In the event the NPS does not carry out the terms of this agreement, the NPS will comply with 36 CFR Part 800.4 through 800.6 with regard to individual undertakings covered by this agreement.

XII. REVIEW OF AGREEMENT

- A. On or before October 15 of each year until the NPS has completed its responsibilities under this programmatic agreement and the Programmatic Agreement Among the National Conference of State Historic Preservation Officers and Advisory Council on Historic Preservation, the NPS will prepare and provide to the SHPO, Council, and NPS Federal Preservation Officer an annual report describing how it is carrying out its responsibilities. The report will include, at a minimum, a list of "no effect and "no adverse effect"actions carried out in accordance with Stipulation II, above; identification of

professional cultural resources staff reviewing projects, on-site meetings, technical issues and ongoing major undertakings [plans, projects, and compliance training of review and park staff]. The NPS shall ensure that its annual report is made available to the SAFR Advisory Commission and for public inspection, that potentially interested members of the public are made aware of its availability, and that interested members of the public are invited to provide comments to the SHPO as well as to the NPS. The NPS will also utilize the Park's Advisory Commission for purpose of public inspection of the report. The SHPO and Council will review the annual report and provide comments to the NPS.

- B. At the request of any party to this agreement, the NPS will convene a meeting or meetings to facilitate review and comment or to resolve questions regarding the annual report.
- C. The SHPO and the Council may monitor activities carried out pursuant to this agreement, and the Council will review such activities if so requested. The NPS shall cooperate with the SHPO and the Council in carrying out their monitoring and review responsibilities.

XIII. TERMINATION

The NPS, SHPO or ACHP may terminate this programmatic agreement by providing 15 calendar days' notice, excluding state and federal holidays, to the other parties provided that the parties will consult during the period prior to termination to seek agreement on amendments or other actions that would avoid termination. In the event of termination, the NPS will comply with 36 CFR Part 800.4 through 800.6 for individual undertakings covered by this programmatic agreement.

XIV. EXPIRATION

This programmatic agreement will be null and void July 15, 2010 unless the signatories agree upon continued applicability.

Execution and implementation of this programmatic agreement evidences that the NPS has satisfied its Section 106 and 110 responsibilities for all individual actions in Alternative A of the June 1996 draft General Management Plan/Environmental Impact Statement, San Francisco Maritime National Historical Park and covered by this agreement.

NATIONAL PARK SERVICE

By: William S. Thomas
Superintendent, San Francisco Maritime NHP

3/25/97
Date

Shirley P. Albright
Field Director, Pacific West Field Area

3/31/97
Date

CALIFORNIA STATE HISTORIC PRESERVATION OFFICE

By: B. Edell
State Historic Preservation Officer

4/17/97
Date

ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: John M. Smith
Advisory Council on Historic Preservation

4/25/97
Date

CONCUR

By: hil l h t CHAIRMAN
SAFR Advisory Commission

6/11/97
Date



As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

